Michael Grinblat (4159752)

Law Offices of Michael Grinblat 817 Broadway, Fourth Floor

New York, NY 10003 Tel: (347) 796-0712

Fax: (212) 202-5130

Email: michael.grinblatesq@gmail.com

Attorney for the Plaintiff

IN THE UNITED STATES DISTRICT COURT IN AND FOR THE EASTERN DISTRICT OF NEW YORK

SEMYON GRINBLAT, individually and on behalf of all others similarly situated,

AFFIDAVIT OF ATTORNEY'S FEES, COSTS AND EXPENSES AND DECLARATION

Plaintiff,

-against-

H & 6 ASSOCIATE INC., JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown,

CASE NO.: 19-cv-2034-LDH-SMG

Defendants.

The present Affidavit of Attorney's Fees, Costs and Expenses and Declaration is submitted pursuant to the Court's Report and Recommendation [Document 17].

The Plaintiff demands that the Defendant, H & 6 ASSOCIATE INC., compensates him for his attorney's fees for 52.7 hours of time at the rate of \$544 per hour, for the secretarial services for 11 hours of time at \$75 per hour and for costs and expenses in the amount of \$894.02, for the total amount of \$30,387.82. These fees, costs and expenses are itemized on the invoice [Exhibit 1].

The Plaintiff demands that the Defendant compensates his attorney at the rate of \$544 per hour. This amount is based on the United States Attorney Office's Attorney's Fees Matrix

[Exhibit 2], which has been adapted by the courts. The undersigned counsel has substantial

experience. He was admitted to practice in 2003 and practiced law for over 16 years.

The Plaintiff's attorney kept records of his expenses [Exhibit 3] and sent numerous

letters, including many letters to the Defendant, in which he informed its chief executive officer

of the status of the litigation and invited him or her to enter into settlement negotiations in order

to avoid prolonged litigation and spending money on attorney's fees and expenses [Exhibit 4].

The Defendant has failed to respond to the correspondence of the undersigned counsel.

I declare under penalty of perjury that the foregoing is true and correct.

February 11, 2020

Respectfully submitted,

Attorney for the Plaintiff Law Offices of Michael Grinblat

Michael Grinblat, Esq. (4159752)

817 Broadway, Fourth Floor

New York, NY 10003

Tel: (347) 796-0712 Fax: (212) 202-5130

Email: michael.grinblatesq@gmail.com

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CERTIFICATE OF SERVICE

I certify that on this 11th day of February, 2020, I filed the foregoing Affidavit of Attorney's Fees, Costs and Expenses and Declaration with the Court via CM/ECF, which caused notice to be served upon all e-filing counsel of record. On the same date I also served the following, via U.S. Mail, by Priority Mail, Signature Requested, postage prepaid:

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

(The above is the address to which the New York Department of State mails process, if accepted on behalf of the entity. No registered agent is listed on the New York Department of State website. The above is also the entity's business address, at which it is presently conducting its business.)

EXHIBIT 1

INVOICE

Law Offices of Michael Grinblat

INVOICE

Law Offices of Michael Grinblat 817 Broadway, 4th Fl. New York, NY 10003 michael.grinblatesq@gmail.com michael.grinblatesq@gmail.com O: (347) 796-0712 F: (212) 202-5130

 Number
 1

 Issue Date
 2/8/2020

 Due Date
 3/9/2020

Bill To:

Semyon Grinblat

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Communicate (with client) 12/11/2018 Discussed with the client his visit to the Subject Facility, including the inconveniences he experienced, the kind, type and extent of violations of the ADA and whether to file a legal action against the Subject Facility.	Michael Grinblat	\$544.00	0.40	\$217.60
Travel 12/18/2018 Travelled to and from the Subject Facility in order to investigate the violations of the ADA.	Michael Grinblat	\$544.00	1.00	\$544.00
Investigation 12/18/2018 Investigation, examination analysis and measurement of ADA violations.	Michael Grinblat	\$544.00	0.70	\$380.80
Prepare for Mailing/Mailing 1/30/2019 Worked on mailing to the defendant, H & 6 Associate Inc., by priority mail, signature confirmation requested, of Report and Recommendation of Magistrate Judge Steven M. Gold regarding the Motion for Default Judgment. With that correspondence I included copies of the 12-page Report and Recommendation, Motion for Default Judgment with all exhibits and the Court's notice received by ECF regarding the Report and Recommendation. Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it;	Michael Grinblat	\$75.00	0.50	\$37.50
recorded cost of mailing into the software. SECRETARIAL RATE				
Research 4/5/2019 Researched corporate identities of the defendants in order to determine against what entities and/or individuals the legal action should be filed. Conducted research on the site of the Department of Corporations and on ACRIS.	Michael Grinblat	\$544.00	1.00	\$544.00

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Case 1:19 ev 02034-LDH-SMC Document	19 Filed 02 Billed By	/11/20 Page Rate	6 of 101 Pa	ngeID #: 314 Sub
Research 4/5/2019 Researched and analyzed applicable laws in connection with drafting the complaint on behalf of the client.	Michael Grinblat	\$544.00	1.50	\$816.00
Communicate (in firm) 4/8/2019 Discussed the intended filing of the case with my co-counsel, Mr. Adam D. Ford.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 4/8/2019 Drafted and revised the ADA complaint.	Michael Grinblat	\$544.00	7.00	\$3,808.00
Review/analyze 4/9/2019 Reviewed the ECF bounce, which contained the following text: "COMPLAINT against All Defendants filing fee \$ 400, receipt number ANYEDC-11365098 Was the Disclosure Statement on Civil Cover Sheet completed -YES, filed by Semyon Grinblat. (Attachments: # 1 Civil Cover Sheet, # 2 Proposed Summons H & 6 Associate Inc., # 3 Proposed Summons The Hugh Family Revocable Trust) (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Filing 4/9/2019 Filed the complaint, two proposed summonses and the civil cover sheet on ECF.	Michael Grinblat	\$544.00	0.40	\$217.60
Draft/revise 4/9/2019 Drafted proposed summons on H & 6 Associate Inc.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 4/9/2019 Drafted proposed summons on The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 4/9/2019 Drafted civil cover sheet.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (with client) 4/9/2019 Discussed filing of the case with the client.	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 4/9/2019 Worked on mailing copy of the complaint to the New York Civil Rights Bureau. Printed pages of the document, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software SECRETARIAL RATE	Michael Grinblat	\$75.00	0.30	\$22.50

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Case 1:19-cv-02034-LDH-SMG Document	19 Filed 02 Billed By	2/11/20 Pag Rate	e 7 of 101 Hours	PageID #: 315
Prepare for Mailing/Mailing 4/9/2019 Worked on mailing a copy of the complaint and cover letter to the New York City Commission on Human Rights. Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software. SECRETARIAL RATE.	Michael Grinblat	\$75.00	0.30	\$22.50
Review/analyze 4/11/2019 Reviewed the ECF bounce, which contained the following text: "Case Assigned to Judge LaShann DeArcy Hall and Magistrate Judge Steven M. Gold. Please download and review the Individual Practices of the assigned Judges, located on our website. Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. (Davis, Kimberly)"	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 4/11/2019 Reviewed the ECF bounce, which contained the following text: "In accordance with Rule 73 of the Federal Rules of Civil Procedure and Local Rule 73.1, the parties are notified that if all parties consent a United States magistrate judge of this court is available to conduct all proceedings in this civil action including a (jury or nonjury) trial and to order the entry of a final judgment. Attached to the Notice is a blank copy of the consent form that should be filled out, signed and filed electronically only if all parties wish to consent. The form may also be accessed at the following link: http://www.uscourts.gov/uscourts/FormsAndFees/Forms/AO085.pdf. You may withhold your consent without adverse substantive consequences. Do NOT return or file the consent unless all parties have signed the consent. (Davis, Kimberly)"	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 4/11/2019 Reviewed the attachment to the ECF bounce regarding the notice pursuant to Rule 73 of the Federal Rules of Civil Procedure and Local Rule 73.1.	Michael Grinblat	\$544.00	0.20	\$108.80
Review/analyze 4/11/2019 Reviewed the ECF bounce, which contained the following text: "This attorney case opening filing has been checked for quality control. See the attachment for corrections that were made, if any. (Davis, Kimberly)"	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 4/11/2019 Reviewed the attachment to the ECF bounce, which contained the following text: "This attorney case opening filing has been checked for quality control. See the attachment for corrections that were made, if any. (Davis, Kimberly)" Reviewed the quality control report regarding filing of the case using the ECF.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 4/11/2019 Reviewed the ECF bounce, which contained the following text: "Summons Issued as to H & 6 Associate Inc., The Hugh Family Revocable Trust. (Attachments: # 1 Summon) (Davis, Kimberly)"	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document	19 Filed 02 Billed By	2/11/20 Pag Rate	e 8 of 101 Hours	PageID #: 316 Sub
Review/analyze 4/11/2019 Reviewed and analyzed the summons issued by the Court on the defendant H & 6 Associates, Inc.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 4/11/2019 Reviewed and analyzed the summons issued by the court on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 4/18/2019 Discussed the status of the case with my co-counsel, Mr. Adam D. Ford.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/18/2019 Telephone conversation. Discussed serving of process on the Hugh Family Revocable Trust with the process server's representative, "Spark Process Service".	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (other external) 4/18/2019 Sent an email to the server of process, Spark Process Service, with a request to perform personal service on The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (other external) 4/18/2019 At the request of the process server, Spark Process Service, I paid for service of process by using Cash App on my mobile phone. Immediately prior to making the payment, I had to download the app to the phone, install it, register and then send the money using it.	Michael Grinblat	\$75.00	0.30	\$22.50
SECRETARIAL RATE				
Communicate (other external) 4/18/2019 Sent an email to the process server, Spark Process Service, in which I informed him that, at the request of the process server, I sent him \$85 through Cash App. This was in connection with serving process on The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/18/2019 Reviewed the email from Spark Process Service, in which the process server confirmed that he received the \$85 I sent him through Cash App. This is in connection with personally serving The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (with client) 4/19/2019 Discussed the status of the case with the client.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/25/2019 Sent an email to the process server, Spark Process Service, in which I inquired whether the company served the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.20	\$108.80

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Case 1:19-cv-02034-LDH-SMG Document	110 Filed 02 Billed By	2/11/20 Page Rate	9 of 101 Hours	PageID #: 317 Sub
Communicate (other external) 4/25/2019 Reviewed the email from the process server, Spark Process Service, in which the server of process wrote that he is on the way to personally serve the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/25/2019 I emailed additional instructions to the process server, Spark Process Service, in connection with performing personal service on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/26/2019 Sent an email to the server of process, Spark Process Service, in which I inquired of the server of process whether he was able to serve process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/26/2019 Reviewed the email response from the server of process, Spark Process Service, in which the server of process wrote that he attempted to serve the defendant, The Hugh Family Revocable Trust, but was not successful and that he is planning to attempt to serve the defendant again after 5:00 pm.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/26/2019 Sent an email to the server of process, Spark Process Service, in connection with serving the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/27/2019 I called the server of process, Spark Process Service, and attempted to leave a voicemail when no one answered the phone. The purpose of the call was to inquire of the status of service of process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/28/2019 I called the server of process, Spark Process Service, and attempted to leave a voicemail when no one answered the phone. The purpose of the call was to inquire of the status of service of process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/29/2019 I called the server of process, Spark Process Service, and attempted to leave a voicemail when no one answered the phone. The purpose of the call was to inquire of the status of service of process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/29/2019 Sent an email to server of process, Spark Process Service, in which I inquired on the status of service of process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	/11/20 Page Rate	10 of 101 Hours	PageID #: 318 Sub
Communicate (other external) 4/30/2019 I called the server of process, Spark Process Service, and attempted to leave a voicemail when no one answered the phone. The purpose of the call was to inquire of the status of service of process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 4/30/2019 Sent an email to the server of process, Spark Process Service, in which I requested an update on the status of the service on the defendant, The Hugh Family Revocable Trust. (I did not receive a response to the inquiry of 4/29/19.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/1/2019 Sent an extended email to the server of process, Spark Process Service, in connection with performing service on The Hugh Family Revocable Trust. I demanded explanation as to why the process server is not responding to my repeated phone calls and emails and demanded that he return the \$85 I paid for the service of process through Cash App.	Michael Grinblat	\$544.00	0.30	\$163.20
Communicate (other external) 5/1/2019 I called the server of process, Spark Process Service, and attempted to leave a voicemail when no one answered the phone. The purpose of the call was to inquire of the status of service of process on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/1/2019 Reviewed an email from the server of process, Spark Process Service, in which the server of process informed me on the status of service on the defendant, The Hugh Family Revocable Trust. He informed me that the service was performed successfully and that he is going to send me a notarized affidavit of service. He did not subsequently do that.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/1/2019 I sent an email to the server of process, Spark Process Service, in which I requested an explanation as to how the server of process served the defendant, The Hugh Family Revocable Trust. I demanded from him the GPS tracking proof, which would show me that he visited the location three times. He promised to provide GPS tracking proof prior to me paying him for service. It was an essential part of the agreement and he advertised that service.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/2/2019 I called another company, Alexander Poole, to inquire whether it performs personal service. I did so, because the previous server of process, Spark Process Service, failed to serve the defendant, The Hugh Family Revocable Trust. Alexander Poole's representative assured me that his company performs personal service. We discussed the logistics and price of personal service.	Michael Grinblat	\$544.00	0.20	\$108.80

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	/11/20 Page Rate	11 of 101 Hours	PageID #: 319
Communicate (other external) 5/2/2019 I emailed detailed instructions to the server of process, Alexander Poole, in connection with service of process on the defendant, The Hugh Family Revocable Trust. I attached several documents to the detailed email, including summons on The Hugh Family Revocable Trust, complaint, the deed, which contained the defendant's address and the summons on a co-defendant, H & 6 Associate Inc.	Michael Grinblat	\$544.00	0.40	\$217.60
Communicate (in firm) 5/2/2019 I sent an email to my co-counsel, Mr. Adam Ford, in which I explained to him the status of service of process on the defendant, The Hugh Family Revocable Trust and the necessity of switching to another company, Alexander Poole, in order to serve the defendant, The Hugh Family Revocable Trust, by personal service.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (other external) 5/2/2019 Reviewed the email from Alexander Poole, in which the company informed me that my request for service was received and that I would be contacted in the short future for payment.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (with client) 5/3/2019 Discussed the status of the case with the client over the phone.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/8/2019 Received a telephone call from the server of process, Alexander Poole, in which the company's representative informed me that the address, which is listed on the deed, is a residential one and inquired whether service on the defendant, The Hugh Family Revocable Trust, should be performed at that address. I requested the company to serve the resident, who would open the door.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 5/10/2019 Discussed the status of the case with my co-counsel, Mr. Adam D. Ford.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (with client) 5/10/2019 Discussed the status of the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/10/2019 Reviewed an email from Alexander Poole, in which the server of process informed me that the company personally served the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 5/10/2019 Reviewed the affidavit of service regarding service of process on he defendant, The Hugh Family Revocable Trust, which was emailed to me by the server of process, Alexander Poole.	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	11/20 Page Rate	12 of 101 Hours	PageID #: 320 Sub
Filing 5/10/2019 Filing of a document using the Court's ECF system. I filed the affidavit of service on The Hugh Family Revocable Trust using the court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 5/10/2019 I reviewed the following ECF bounce: "SUMMONS Returned Executed by Semyon Grinblat. The Hugh Family Revocable Trust served on 5/9/2019, answer due 5/30/2019. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 5/10/2019 I sent an email to my co-counsel, Mr. Adam Ford, in which I wrote him that "I received from the server of process the affidavit of service on The Hugh Family Revocable Trust and filed it with the court."	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 5/11/2019 Drafted a letter to the owner of H & 6 Associate Inc., in which I informed him or her of the legal action filed against it.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 5/11/2019 Drafted a letter to the trustee and/or owner of The Hugh Family Revocable Trust, in which I informed him or her that I filed a legal action against the trust. In that correspondence I included courtesy copies of the summons and complaint. The correspondence was sent by priority mail.	Michael Grinblat	\$544.00	0.20	\$108.80
Prepare for Mailing/Mailing 5/11/2019 Worked on mailing courtesy copies of the summons and complaint to the defendant, H & 6 Associate Inc. Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software. SECRETARIAL RATE.	Michael Grinblat	\$75.00	0.30	\$22.50
Prepare for Mailing/Mailing 5/11/2019 Worked on mailing courtesy copy of the summons and complaint to the defendant, The Hugh Family Revocable Trust. Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software. SECRETARIAL RATE.	Michael Grinblat	\$75.00	0.30	\$22.50
Communicate (other external) 5/12/2019 I sent an email to Alexander Poole, in which I requested an affidavit of service on H & 6, which I did not receive from the company.	Michael Grinblat	\$544.00	0.10	\$54.40
Filing 5/13/2019 Filed on ECF the affidavit of service regarding H & 6 Associate Inc.	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	11/20 Page Rate	13 of 101 Hours	PageID #: 321
Review/analyze 5/13/2019 Reviewed the ECF Bounce, which contained the following text: "SUMMONS Returned Executed by Semyon Grinblat. H & 6 Associate Inc. served on 5/8/2019, answer due 5/29/2019. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/13/2019 I received an email from Alexander Poole to which was attached the affidavit of service on H & 6 Associate Inc.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 5/13/2019 Reviewed the affidavit of service on H & 6 Associate Inc, which was sent to me by the server of process, Alexander Poole.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 5/13/2019 Sent an email to Alexander Poole regarding the affidavits of service.	Michael Grinblat	\$544.00	0.10	\$54.40
Research 6/17/2019 Researched the procedure on how to draft, apply for and file a certificate of default in connection with the necessity to apply for these certificates against the defendants, H & 6 Associate Inc. and The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	1.50	\$816.00
Communicate (in firm) 6/17/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 6/18/2019 Drafted a letter addressed to a trustee and/or owner of The Hugh Family Revocable Trust, in which I informed him or her that I filed with the court an application for a certificate of default. With that correspondence I included copies of the summons, complaint and affidavit of service. That correspondence was sent by priority mail.	Michael Grinblat	\$544.00	0.30	\$163.20
Draft/revise 6/18/2019 Drafted a letter, addressed to the CEO of H & 6 Associate Inc., in which I informed him or her that I filed an application for a certificate of default. I enclosed copies of the summons, complaint, affidavit of service and the application for a certificate of default.	Michael Grinblat	\$544.00	0.30	\$163.20
Draft/revise 6/18/2019 Drafted certificate of default on the defendant, H & 6 Associate, Inc.	Michael Grinblat	\$544.00	0.60	\$326.40
Draft/revise 6/18/2019 Drafted certificate of default on the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.60	\$326.40

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	/11/20 Page Rate	14 of 101 Hours	PageID #: 322 Sub
Filing 6/18/2019 Filed with the court the application for a certificate of default against the defendant, H & 6 Associate, Inc., using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Filing 6/18/2019 Filed with the court the application for a certificate of default against the defendant, The Hugh Family Revocable Trust, using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 6/18/2019 Reviewed the ECF bounce, which contained the following text: "Request for Certificate of Default by Semyon Grinblat (Grinblat, Michael)". This ECF bounce was received regarding the application for a certificate of default against the defendant H & 6 Associates, Inc.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 6/18/2019 Reviewed the ECF bounce, which contained the following text: "Request for Certificate of Default by Semyon Grinblat (Grinblat, Michael)". This ECF bounce was received regarding the application for a certificate of default against the defendant The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 6/18/2019 Worked on mailing courtesy copies of the summons, complaint, application for a certificate of default and cover letter to the defendant, H & 6 Associate Inc., in connection with notifying it of the application for a certificate of default to the clerk of court.	Michael Grinblat	\$75.00	0.40	\$30.00
Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Prepare for Mailing/Mailing 6/18/2019 Worked on mailing courtesy copies of the summons, complaint, application for a certificate of default and cover letter to the defendant, The Hugh Family Revocable Trust, in connection with notifying it of the application for a certificate of default to the clerk of court.	Michael Grinblat	\$75.00	0.40	\$30.00
Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Communicate (with client) 6/19/2019 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02/ Billed By	11/20 Page Rate	15 of 101 Hours	PageID #: 323
Review/analyze 6/25/2019 Reviewed the ECF bounce, which contained the following text: "Clerk's ENTRY OF DEFAULT It appearing from the docket maintained in this action that defendant H & 6 Associate Inc. has failed to appear or otherwise defend this action, the default of defendant H & 6 Associate Inc. is hereby noted pursuant to Rule 55a of the Federal Rules of Civil Procedure.(Poveda, J.)"	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 6/25/2019 Reviewed the ECF Bounce, which stated the following: "REQUEST for Certificate of Default is denied at this time. It appears from the affidavit of service that proper service was not effected as the Corporate Defendant THE HUGH FAMILY REVOCABLE TRUST was served on behalf of a "Jane Doe" re [8] Request for Certificate of Default (Poveda, J.)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 7/2/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford.	Michael Grinblat	\$544.00	0.20	\$108.80
Research 7/2/2019 Researched the procedure on how to draft and apply for a motion for default judgment in connection with the necessity of drafting such a motion against the defendant, H & 6 Associate, Inc. Reviewed Moore's treatise, Federal Litigation Guide: New York and Connecticut and samples of motions for default judgment filed by other attorneys.	Michael Grinblat	\$544.00	6.00	\$3,264.00
Communicate (with client) 7/3/2019 Discussed the case with the client.	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 7/6/2019 Drafted motion for default judgment against the defendant, H & 6 Associate Inc. Gathered, reviewed, analyzed and assembled the exhibits to be attached to the motion. Their purpose was to show work performed on notifying the defendant of the present action, as well as notifying the NYC Commission of Human Rights and the New York State Civil Rights Bureau. Including the exhibits, the motion for default judgment came out to be 95 pages long.	Michael Grinblat	\$544.00	8.00	\$4,352.00
Filing 7/6/2019 Filed motion for default judgment against H & 6 Associate Inc using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 7/6/2019 Reviewed ECF bounce, which contained the following text: "MOTION for Default Judgment against H & 6 Associate Inc. by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 7/6/2019 Drafted a letter to the CEO of H & 6 Associate Inc., in which I informed him or her that I filed a motion for default judgment against the defendant, H & 6 Associate Inc. I included a copy of the motion with all exhibits with the correspondence.	Michael Grinblat	\$544.00	0.30	\$163.20

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Case 1:19-cv-02034-LDH-SMG Document ime Entries	19 Filed 02 Billed By	11/20 Page Rate	16 of 101 Hours	PageID #: 324 Sub
Prepare for Mailing/Mailing 7/6/2019 Worked on mailing courtesy copies of the motion for default judgment, summons, complaint, application for a certificate of default and cover letter to the defendant, H & 6 Associate Inc., in connection with notifying it of the filing of the Motion for Default Judgment.	Michael Grinblat	\$75.00	0.50	\$37.50
Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Review/analyze 7/8/2019 Reviewed the ECF bounce, which contained the following text: "ORDER: Plaintiff's July 6, 2019 motion 10 for default judgment is respectfully referred to Magistrate Judge Steven M. Gold for a report and recommendation. (Ramesar, Thameera)"	Michael Grinblat	\$544.00	0.10	\$54.40
Oraft/revise 7/9/2019 Orafted a letter to the Honorable LaShann DeArcy Hall in connection with sending her a courtesy copy of the Motion for Default Judgment n accordance with the Judge's individual practices and rules.	Michael Grinblat	\$544.00	0.20	\$108.80
Prepare for Mailing/Mailing 7/9/2019 Worked on preparing courtesy copy of the Motion for Default Judgment on H & 6 Associates Inc.	Michael Grinblat	\$75.00	1.50	\$112.50
Printed pages of the documents, printed the cover letter, prepared the binder, punched holes in the motion and inserted it in the binder, paid for postage and mailing label,printed labels, attached labels to the envelope and the binder, inserted documents in the binder and then the envelope, walked to the nearby UPS facility and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Review/analyze 7/9/2019 Reviewed the ECF bounce, which contained the following text: CORDER re 10 MOTION for Default Judgment against H & 6 Associate Inc. filed by Semyon Grinblat: Any submissions that defendant H & 6 Associate Inc. ("H & 6") wishes to make in response are due no later than July 26, 2019. Any reply plaintiff wishes to make, and any other submissions plaintiff wishes to provide in support of his motion shall be filed by August 2, 2019. Upon receipt of this Order, plaintiff is hereby directed to serve a copy of this Order promptly by certified mail, return receipt requested, on defendant H & 6 at its last known address, and to provide the Court with copies of the return receipts. Ordered by Magistrate Judge Steven M. Gold on 7/9/2019. (Farmer, John)"	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 7/9/2019 Reviewed document 11, "ORDER re 10 MOTION for Default Judgment"	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document Ime Entries	19 Filed 02 Billed By	11/20 Page Rate	17 of 101 Hours	PageID #: 325
Communicate (in firm) 7/10/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 7/10/2019 Drafted a letter to the CEO of H & 6 Associate Inc., in which I informed him or her that I filed the affidavit of service regarding service on that defendant of the motion of default judgment and included the affidavit of service with all exhibits in the correspondence.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 7/10/2019 Drafted a letter to the CEO of H & 6 Associate Inc., in which I informed him or her that Magistrate Judge Steven M. Gold issued an order on July 9, 2019. I included the order with that correspondence.	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 7/10/2019 Drafted affidavit of service on the defendant, H & 6 Associate Inc., gathered, assembled, reviewed and attached the exhibits to the affidavit, [document 12].	Michael Grinblat	\$544.00	0.40	\$217.60
Filing 7/10/2019 Filed affidavit of service on H & 6 Associate Inc. [Document 12] on ECF.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 7/10/2019 Reviewed ECF bounce, which contained the following text: "AFFIDAVIT of Service for Motion for Default Judgment Against H & 6 Associate Inc. served on H & 6 Associate Inc. on July 6, 2019, filed by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 7/10/2019 Worked on mailing copies of the Affidavit of Service, with exhibits, regarding service of the Motion of Default Judgment on the defendant, H & 6 Associate Inc. to that defendant. Printed pages of the documents, printed the cover letter, inserted	Michael Grinblat	\$75.00	0.30	\$22.50
documents in the envelope, affixed the stamp and mailed it; recorded cost of mailing into the software. SECRETARIAL RATE				
Prepare for Mailing/Mailing 7/10/2019 Worked on mailing a copy of Magistrate Judge Steven M. Gold's Order to the defendant, H & 6 Associate Inc. Printed pages of the documents, printed the cover letter, paid for postage of certified mail, filled out the return receipt form, inserted documents in the envelope, walked to the post office, stood in line,	Michael Grinblat	\$75.00	1.30	\$97.50
then walked back from it; recorded cost of mailing into the software. SECRETARIAL RATE				

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	11/20 Page Rate	18 of 101 Hours	PageID #: 326 Sub
Communicate (with client) 7/11/2019 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 7/12/2019 Worked on mailing a copy of the Motion for Default Judgment, with all exhibits, to the defendant, H & 6 Associate Inc., by first class mail, certified mail, return receipt requested.	Michael Grinblat	\$75.00	1.30	\$97.50
Printed pages of the documents, printed the cover letter, paid for postage of certified mail, filled out the return receipt form, inserted documents in the envelope, walked to the post office, stood in line, then walked back from it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Draft/revise 7/12/2019 Drafted a letter to the CEO of H & 6 Associate Inc., which informed him or her that I am re-sending the copy of the motion for default judgment by first class mail, certified mail, return receipt requested. I included with the correspondence a copy of the motion for default judgment with exhibits.	Michael Grinblat	\$544.00	0.30	\$163.20
Draft/revise 7/18/2019 Drafted a third letter to the CEO of H & 6 Associate Inc., in which I informed him or her that I filed a motion for default judgment and that Magistrate Judge Steven M. Gold issued an Order. I also informed the defendant that I did not receive the return receipts and that the previously sent correspondences may have been lost by the post office. In the correspondence I included a copy of the motion for default judgment with all exhibits and a copy of Magistrate Judge Steven M. Gold's Order.	Michael Grinblat	\$544.00	0.30	\$163.20
Prepare for Mailing/Mailing 7/18/2019 Worked on mailing the letter regarding filing of the Motion for Default Judgment against the defendant, H & 6 Associate Inc. This is the third mailing. With this correspondence I sent a copy of the Motion for Default Judgment.	Michael Grinblat	\$75.00	0.40	\$30.00
Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Communicate (other external) 7/25/2019 Sent an email to my co-counsel, Adam D. Ford, regarding difficulties with service by mail of the Court's order on H & 6 Associate, Inc.	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	Billed By	Rate	19 of 101 Hours	PageID #. 327 Sub
Draft/revise 8/3/2019 Drafted a letter, addressed to the CEO of H & 6 Associate Inc., in which I informed him or her that I filed a motion for default judgment against the entity. I included with the correspondence a copy of the motion for default judgment, with all the exhibits, and a copy of Magistrate Judge Steven M. Gold's Order, as well as a copy of the affidavit of service regarding filing of that motion. In addition, I included with the correspondence copies of the letters I sent on previous occasions. This is the fourth attempt to notify the defendant of the filing of the motion for default judgment and of the Magistrate Judge's Order. That correspondence was sent by priority mail, signature confirmation requested.	Michael Grinblat	\$544.00	0.20	\$108.80
Prepare for Mailing/Mailing 8/3/2019 Worked on mailing the fourth notice regarding filing of the Motion for Default Judgment against the defendant, H & 6 Associate Inc. to that defendant. That correspondence was sent by priority mail with signature confirmation. With that correspondence I Sent copies of the Motion for Default Judgment, with all exhibits, the Order issued by Magistrate Judge Steven M. Gold, and letters sent on July 6, 2019 and July 12, 2019. Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.	Michael Grinblat	\$75.00	0.40	\$30.00
CECHEIMINETVITE				
Prepare for Mailing/Mailing 8/5/2019 Worked on mailing the fifth notice regarding filing of the Motion for Default Judgment against the defendant, H & 6 Associate Inc. to that defendant. That correspondence was sent by certified mail, return receipt requested. With that correspondence I Sent copies of the Motion for Default Judgment, with all exhibits, the Order issued by Magistrate Judge Steven M. Gold, and letters sent on July 6, 2019, July 12, 2019 and August 3, 2019. Printed pages of the documents, printed the cover letter, inserted documents in the envelope, filled out the certified letter form and return receipt form, walked to the post office, stood in line and mailed the correspondence, then walked back from the post office; recorded cost of mailing into the software.	Michael Grinblat	\$75.00	1.30	\$97.50
SECRETARIAL RATE				
Draft/revise 8/5/2019 Drafted a letter to the CEO of the defendant, H & 6 Associate Inc., in which I informed him or her that I filed a motion for default judgment and that Magistrate Judge Steven M. Gold issued an order. With that correspondence I also included copies of the motion for default judgment, Magistrate Judge Gold's Order, affidavit of service regarding filing a motion for default judgment. That correspondence was sent by certified mail, return receipt requested.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (in firm) 8/5/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.20	\$108.80

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Case 1:19 cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	11/20 Page Rate	20 of 101 Hours	PageID #: 328
Draft/revise 8/13/2019 Drafted affidavit of service [document 13] on H & 6 Associate Inc., gathered, reviewed, assembled and analyzed documents to be used as exhibits to show the work involved with serving the defendant, H & 6 Associate Inc. The total size of the affidavit is 32 pages.	Michael Grinblat	\$544.00	1.00	\$544.00
Filing 8/13/2019 Filed the Affidavit of Service for Motion for Default Judgment on the defendant, H & 6 Associate Inc. [Document 13] using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 8/13/2019 Reviewed the ECF bounce, which contained the following text: "AFFIDAVIT of Service for Motion for Default Judgment Against H & 6 Associate Inc. and the Court's Order of July 9, 2019 served on H & 6 Associate Inc. on August 7, 2019, filed by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 8/13/2019 Drafted a letter to the CEO of the defendant, H & 6 Associate Inc., in which I informed him or her hat I filed an affidavit of service regarding filing of the motion for default judgment against the defendant, H & 6 Associate Inc. In that correspondence I also included a copy of the Court's Order of July 9, 2019.	Michael Grinblat	\$544.00	0.20	\$108.80
Review/analyze 8/13/2019 Reviewed the ECF bounce, which contained the following text: "AFFIDAVIT of Service for Motion for Default Judgment Against H & 6 Associate Inc. and the Court's Order of July 9, 2019 served on H & 6 Associate Inc. on August 7, 2019, filed by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 8/13/2019 Worked on mailing of the letter to H & 6 Associate Inc. regarding Affidavit of Service regarding Motion for Default Judgment against H & 6 Associate Inc. That correspondence was mailed by priority mail. Printed pages of the documents, printed the cover letter, paid for postage and mailing label at USPS.com, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.	Michael Grinblat	\$75.00	0.30	\$22.50
SECRETARIAL RATE				
Communicate (with client) 8/14/2019 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 9/2/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.20	\$108.80

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	11/20 Page Rate	21 of 101 Hours	PageID #: 329
Review/analyze 9/3/2019 Reviewed the ECF bounce, which contained the following text: "NOTICE of Voluntary Dismissal by Semyon Grinblat of The Hugh Family Revocable Trust (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (with client) 9/3/2019 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 9/3/2019 Drafted a letter to the CEO of H & 6 Associate Inc., in which I informed him or her that I filed a Notice of Voluntary Dismissal regarding the co-defendant, The Hugh Family Revocable Trust, which I filed with the Court on the same day. I included a copy of the Notice of Voluntary Dismissal with the correspondence.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 9/3/2019 Drafted a letter to a trustee and/or owner of The Hugh Family Revocable Trust, in which I informed him or her hat I voluntarily dismissed the defendant from the action. With that correspondence I included a copy of the notice of voluntary dismissal of the defendant, The Hugh Family Revocable Trust. That correspondence was sent by first class mail.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 9/3/2019 Drafted Notice of Voluntary Dismissal of The Hugh Family Revocable Trust.	Michael Grinblat	\$544.00	0.30	\$163.20
Filing 9/3/2019 Filed notice of voluntary dismissal [Document 14] against the defendant, The Hugh Family Revocable Trust using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 9/3/2019 Reviewed the ECF bounce, which contained the following text: "NOTICE of Voluntary Dismissal by Semyon Grinblat of The Hugh Family Revocable Trust (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 9/3/2019 Worked on mailing to The Hugh Family Revocable Trust of the Notice of Voluntary Dismissal of The Hugh Family Revocable Trust. The correspondence was mailed by first class mail.	Michael Grinblat	\$75.00	0.20	\$15.00
Printed pages of the documents, printed the cover letter, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				

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Case 1:19-ev-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	/11/20 Page Rate	22 of 101 Hours	PageID #: 330
Prepare for Mailing/Mailing 9/3/2019 Worked on mailing to H & 6 Associate Inc., by first class mail, a copy of the Notice of Voluntary Dismissal of the co-defendant The Hugh Family Revocable Trust. With this correspondence I included a copy of the notice.	Michael Grinblat	\$75.00	0.20	\$15.00
Printed pages of the documents, printed the cover letter, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.				
SECRETARIAL RATE				
Communicate (in firm) 9/4/2019 I sent an email to my co-counsel, Mr. Adam D. Ford, regarding the notice of voluntary dismissal of the defendant.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 10/3/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 10/3/2019 I called Judge Gold's chambers to find out when to expect a ruling on the motion for default judgment against H & 6 Associates, Inc.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (in firm) 10/3/2019 I sent an email to my co-counsel, Adam D. Ford, regarding the motion for default judgment against the defendant, H & 6 Associates, Inc.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (with client) 10/4/2019 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 12/23/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.20	\$108.80
Filing 12/23/2019 Filed motion to reopen case [Document 16] using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 12/23/2019 Reviewed the ECF bounce, which contained the following text: "NOTICE OF VOLUNTARY DISMISSAL: Pursuant to Rule 41(a)(I)(A) (i) of the Federal Rules of Civil Procedure, the Plaintiff, SEMYON GRINBLAT, by and through his undersigned counsel, voluntarily dismisses the Defendant, THE HUGH FAMILY REVOCABLE TRUST, from this action, without prejudice. As of the date of this notice, the Defendant, THE HUGH FAMILY REVOCABLE TRUST, neither appeared in this action, nor answered the complaint, nor filed a motion for summary judgment. Ordered by Judge LaShann DeArcy Hall on 12/23/2019. (Ramesar, Thameera)"	Michael Grinblat	\$544.00	0.10	\$54.40

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Case 1:19-ev-02034-LDH-SMG Document	19 Filed 02/ Billed By	11/20 Page Rate	23 of 101 Hours	PageID #: 331
Review/analyze 12/23/2019 Reviewed document 15, which was attached to the ECF bounce.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 12/23/2019 Reviewed the ECF bounce, which contained the following text: "NOTICE OF VOLUNTARY DISMISSAL: Pursuant to Rule 41(a)(I)(A) (i) of the Federal Rules of Civil Procedure, the Plaintiff, SEMYON GRINBLAT, by and through his undersigned counsel, voluntarily dismisses the Defendant, THE HUGH FAMILY REVOCABLE TRUST, from this action, without prejudice. As of the date of this notice, the Defendant, THE HUGH FAMILY REVOCABLE TRUST, neither appeared in this action, nor answered the complaint, nor filed a motion for summary judgment. Ordered by Judge LaShann DeArcy Hall on 12/23/2019. (Ramesar, Thameera)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (with client) 12/24/2019 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 12/25/2019 Reviewed the ECF bounce, which included the following text: "MOTION to Reopen Case by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 12/25/2019 I sent an email to my co-counsel, Mr. Adam D. Ford, regarding the filed motion to reopen the case.	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 12/25/2019 Drafted a letter, addressed to the CEO of the defendant, H & 6 Associate Inc., in which I informed him or her that I filed a Motion to Reopen Case in this action. I enclosed a copy of that motion. The letter was sent by first class mail.	Michael Grinblat	\$544.00	0.20	\$108.80
Review/analyze 12/25/2019 Reviewed the ECF bounce, which contained the following text: "MOTION to Reopen Case by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 12/25/2019 Drafted motion to reopen case [Document 16].	Michael Grinblat	\$544.00	0.50	\$272.00
Prepare for Mailing/Mailing 12/25/2019 Worked on mailing, by first class mail, to H & 6 Associate Inc. a letter informing it that I filed the Motion to Reopen Case. With that correspondence I mailed a copy of that motion. Printed pages of the documents, printed the cover letter, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.	Michael Grinblat	\$75.00	0.30	\$22.50
SECRETARIAL RATE				

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	11/20 Page Rate	24 of 101 Hours	PageID #: 332 Sub
Review/analyze 12/26/2019 Reviewed the ECF bounce, which included the following text: "ORDER: On December 23, 2019, the Court so-ordered a stipulation of dismissal as to Defendant Hugh Family Revocable Trust [15] leaving Defendants H & 6 Associate Inc. and John Doe 1-X remaining. The Clerk of Court subsequently closed the case in error. Plaintiff's motion [16] to reopen the case as to the remaining Defendants is GRANTED. Ordered by Judge LaShann DeArcy Hall on 12/26/2019. (Valderrama, Freddie)"	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (other external) 12/27/2019 Sent an email to my co-counsel, Mr. Adam D. Ford, regarding the case and motion to reopen it.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 12/29/2019 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (with client) 12/30/2019 Discussed the case with the client.	Michael Grinblat	\$544.00	0.10	\$54.40
Review/analyze 1/28/2020 Reviewed and analyzed the ECF bounce with the following text: "REPORT AND RECOMMENDATIONS re [10] MOTION for Default Judgment against H & 6 Associate Inc. filed by Semyon Grinblat. I respectfully recommend that the Court grant in part and deny in part plaintiff's motion for default judgment, as follows: (1) I recommend that H & 6 Associate be found liable under the Americans with Disabilities Act (ADA), the New York Civil Rights Law, the New York State Human Rights Law (NYSHRL), and the New York City Human Rights Law (NYCHRL); (2) I recommend that an injunction issue with the terms described in this Report; (3) I recommend that plaintiff be awarded \$500 in statutory damages under he New York Civil Rights Law, (4) I recommend that plaintiff be awarded \$1,000 in compensatory damages under the NYSHRL and the NYCHRL; (5) I recommend that plaintiff's request for punitive damages under the NYCHRL be denied; and (6) I recommend that plaintiff's request for an award of attorney's fees and costs under the ADA be denied without prejudice, and that plaintiff's counsel be permitted to submit an appropriate supplemental sworn statement and billing records within fourteen days of the date of this Report and Recommendation. Any objections to the recommendations made in this Report must be submitted within fourteen days after filing of the Report and, in any event, no later than February 11, 2020. See 28 U.S.C. § 636(b)(1); Fed. R. Civ. Proc. 72(b)(2). Failure to file timely objections may waive the right to appeal the District Court's order. See Small v. Sec'y of Health & Human Servs., 892 F.2d 15, 16 (2d Cir. 1989) (discussing waiver under the former ten-day limit). Plaintiff is hereby directed to serve copies of this Report and Recommendation upon H & 6 Associate at its last known address, and to file proof of service with the Court. Ordered by Magistrate Judge Steven M. Gold on 1/28/2020. (Vogele, Jessica)"	Michael Grinblat	\$544.00	0.20	\$108.80
Review/analyze 1/28/2020 Reviewed and analyzed the Report and Recommendation issued by Magistrate Judge Gold.	Michael Grinblat	\$544.00	0.40	\$217.60

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Case 1:19-cv-02034-LDH-SMG Document Time Entries	19 Filed 02 Billed By	/11/20 Page Rate	25 of 101 Hours	PageID #: 333
Communicate (in firm) 1/28/2020 Sent an email to my co-counsel, Mr. Adam D. Ford.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 1/29/2020 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.20	\$108.80
Draft/revise 1/30/2020 Drafted a letter to the CEO of H & 6 Associate Inc., in which I informed him or her that Magistrate Judge Steven M. Gold issued the Report and Recommendation on the motion for default judgment against the defendant, H & 6 Associate Inc. and directed me to to serve a copy of that document on the defendant at its last known address. I included copies of the report and recommendation, both ECF order and the 12-page Report and Recommendation, complaint, summons, affidavit of service, request for a certificate of default, certificate of default and motion for default judgment. That correspondence was sent by priority mail, signature confirmation requested.	Michael Grinblat	\$544.00	0.30	\$163.20
Communicate (with client) 1/30/2020 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Prepare for Mailing/Mailing 1/31/2020 Worked on mailing to H & 6 Associate Inc., by first class mail, of a copy of he affidavit of service regarding Magistrate Judge Steven M. Gold's Report and Recommendation. Printed pages of the documents, printed the cover letter, printed label, attached label to the envelope, inserted documents in the envelope and mailed it; recorded cost of mailing into the software.	Michael Grinblat	\$75.00	0.20	\$15.00
Review/analyze 1/31/2020 Reviewed the ECF bounce, which contained the following text: "AFFIDAVIT of Service for Report and Recommendation [Doc. No. 17] served on H & 6 Associate Inc. on January 31, 2020, filed by Semyon Grinblat. (Grinblat, Michael)"	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 1/31/2020 Drafted the affidavit of service regarding the Report and Recommendation on the Motion for Default Judgment against the defendant, H & 6 Associate Inc.	Michael Grinblat	\$544.00	0.30	\$163.20
Filing 1/31/2020 Filed the affidavit of service regarding Report and Recommendation on the Motion for Default Judgment against the defendant, H & 6 Associate Inc. [Document 18], using the Court's ECF system.	Michael Grinblat	\$544.00	0.10	\$54.40

Invoice #1 Page 21 of 25

Case 1:19-cv-02034-LDH-SMG Document Time Entries	Billed By	11/20 Page Rate	26 of 101 Hours	PageID #: 334 Sub
Draft/revise 1/31/2020 I sent correspondence to the CEO of the defendant, H & 6 Associate Inc., regarding the affidavit of service, which I filed with the Court in complying with the Court's order to send a copy of the Report and Recommendation on the Motion for Default Judgment against the Defendant, H & 6 Associate Inc. at its last known address. I included a copy of the affidavit of service in that correspondence. That correspondence was sent by first class mail.	Michael Grinblat	\$544.00	0.20	\$108.80
Communicate (with client) 2/5/2020 Discussed the case with the client over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Communicate (in firm) 2/6/2020 Discussed the case with my co-counsel, Mr. Adam D. Ford, over the telephone.	Michael Grinblat	\$544.00	0.10	\$54.40
Draft/revise 2/7/2020 Worked on drafting, editing and analysing the list of time entries and expenses in connection with filing them with the Court.	Michael Grinblat	\$544.00	2.50	\$1,360.00
Draft/revise 2/8/2020 Drafted Affidavit of Attorney's Fees and Costs, prepared exhibits, which include receipts and letters sent during the course of the litigation.	Michael Grinblat	\$544.00	1.00	\$544.00
		Time Entries Total	63.70	\$29,493.80
Expenses				
Expense	Billed By	Price	Qty	Sub
Courtfees 4/9/2019 Filing fee, paid at the time of filing the complaint.	Michael Grinblat	\$400.00	1.00	\$400.00
Postage 4/9/2019 Priority mail. Mailed notice of the filing of the lawsuit and copy of the complaint to the New York Civil Rights Bureau.	Michael Grinblat	\$7.35	1.00	\$7.35
Postage 4/9/2019 Priority mail. Mailed notice of the filing of the lawsuit and copy of the complaint to the NYC Commission on Human Rights.	Michael Grinblat	\$7.35	1.00	\$7.35
Printing 4/9/2019 Printed the complaint (35) pages in connection with mailing it to the New York Civil Rights Bureau.	Michael Grinblat	\$0.25	35.00	\$8.75

Invoice #1 Page 22 of 25

Case 1:19-cv-02034-LDH-SMG Document Expense	19 Filed 02 Billed By	11/20 Page	27 of 101 Qty	PageID #: 335
Printing 4/9/2019 Printed a copy of the complaint (35 pages) in connection with mailing it to the New York City Commission on Human Rights.	Michael Grinblat	\$0.25	35.00	\$8.75
Service of Process 4/18/2019 Payment to Spark Process service for personal service on The Hugh Family Revocable Trust.	Michael Grinblat	\$85.00	1.00	\$85.00
Service of Process 5/2/2019 Payment to Alexander Poole for service of process on H & 6 Associates Inc. through the New York Secretary of State.	Michael Grinblat	\$60.00	1.00	\$60.00
Service of Process 5/2/2019 Alexander Poole. Personal service of process on The Hugh Family Revocable Trust.	Michael Grinblat	\$100.00	1.00	\$100.00
Printing 5/11/2019 Printed copies of the summons (2 pages) and complaint (35 pages) in connection with mailing them to the defendant, H & 6 Associates, as courtesy copies.	Michael Grinblat	\$0.25	37.00	\$9.25
Postage 5/11/2019 Priority mail. Mailed courtesy copy of the summons and complaint to H & 6 Associate Inc.	Michael Grinblat	\$7.35	1.00	\$7.35
Postage 5/11/2019 Priority mail. Mailed courtesy copy of the summons and complaint to The Hugh Family Revocable Trust.	Michael Grinblat	\$ 7.35	1.00	\$7.35
Postage 6/18/2019 Priority Mail. Mailed courtesy copy of the application for the Certificate of Default to the CEO of H & 6 Associate Inc.	Michael Grinblat	\$7.35	1.00	\$7.35
Postage 6/18/2019 Priority Mail. Mailed courtesy copy of the application for the Certificate of Default to the trustee/owner of The Hugh Family Revocable Trust.	Michael Grinblat	\$7.35	1.00	\$7.35
Printing 6/18/2019 Printed a copy of the application for the certificate of default (45 pages) in connection with mailing it to the defendant, H & 6 Associates Inc.	Michael Grinblat	\$0.25	45.00	\$ 11.25
Printing 6/18/2019 Printed a copy of the application for the certificate of default (45 pages) in connection with mailing it to the defendant, The Hugh Family Revocable Trust.	Michael Grinblat	\$0.25	45.00	\$11.25

Invoice #1 Page 23 of 25

Case 1:19-cv-02034-LDH-SMG Document Expense	19 Filed 02 Billed By	11/20 Page Price	28 of 101 Qty	PageID #: 336
Printing 7/6/2019 Printed a copy of the motion for default judgment (95 pages) in connection with mailing it to the defendant, H & 6 Associates Inc.	Michael Grinblat	\$0.25	95.00	\$23.75
Postage 7/6/2019 Priority Mail. Mailed a copy of the Motion for Default Judgment to H & 6 Associate Inc.	Michael Grinblat	\$7.35	1.00	\$7.35
Postage 7/9/2019 UPS Ground. Mailed courtesy copy of the Motion for Default Judgment to the Honorable LaShann DeArcy Hall, pursuant to the judge's individual practices and rules.	Michael Grinblat	\$10.22	1.00	\$10.22
Printing 7/9/2019 Printed a copy of the motion for default judgment (95 pages) in connection with mailing a courtesy copy to Judge LaShann DeArcy Hall in compliance with her individual practices and rules.	Michael Grinblat	\$0.25	95.00	\$23.75
Postage 7/10/2019 First Class Mail, Certified Mail, Return Receipt Requested. Mailed a copy of Magistrate Judge Steven M. Gold's Order to H & 6 Associate Inc.	Michael Grinblat	\$6.80	1.00	\$6.80
Postage 7/10/2019 First Class Mail. Mailed a copy of the Affidavit of Service of the Motion for Default Judgment to H & 6 Associates Inc.	Michael Grinblat	\$0.55	1.00	\$0.55
Printing 7/12/2019 Printed a copy of the motion for default judgment (95 pages) in connection with mailing it to the defendant, H & 6 Associates Inc.	Michael Grinblat	\$0.25	95.00	\$23.75
Postage 7/12/2019 First Class Mail, Certified Mail, Return Receipt Requested. Mailed a copy of the Motion for Default Judgment to H & 6 Associates Inc. for the second time.	Michael Grinblat	\$8.65	1.00	\$8.65
Postage 8/3/2019 Priority Mail, Signature Confirmation. Mailed a copy of the Motion for Default Judgment to H & 6 Associate Inc. (4th attempt to serve the defendant)	Michael Grinblat	\$9.35	1.00	\$9.35
Printing 8/3/2019 Printed a copy of the motion for default judgment (95 pages) in connection with mailing it to the defendant, H & 6 Associates Inc.	Michael Grinblat	\$0.25	95.00	\$23.75
Postage 8/13/2019 Priority mail. Mailed Affidavit of Service of the Motion for Default Judgment to H & 6 Associate Inc.	Michael Grinblat	\$7.35	1.00	\$7.35

Invoice #1 Page 24 of 25

Case 1:19-cv-02034-LDH-SMG Document Expense	19 Filed 0 Billed By	2/11/20 Page	29 of 101 Qty	PageID #: 337 Sub
Postage 1/30/2020 Priority Mail with Signature Confirmation. Mailed a copy of Magistrate Judge Steven M. Gold's Report and Recommendation to H & 6 Associates, Inc.	Michael Grinblat	\$10.40	1.00	\$10.40
		Expenses Total:	595.00	\$894.02
	Total (USD)			\$30,387.82
		Paid		\$0.00
		Balance		\$30,387.82

Total Outstanding

\$30,387.82

Invoice #1 Page 25 of 25

EXHIBIT 2

USAO ATTORNEY'S FEES MATRIX

USAO ATTORNEY'S FEES MATRIX — 2015-2019

Revised Methodology starting with 2015-2016 Year

Years (Hourly Rate for June 1 – May 31, based on change in PPI-OL since January 2011)

Experience	2015-16	2016-17	2017-18	2018-19
31+ years	568	581	602	613
21-30 years	530	543	563	572
16-20 years	504	516	536	544
11-15 years	455	465	483	491
8-10 years	386	395	410	417
6-7 years	332	339	352	358
4-5 years	325	332	346	351
2-3 years	315	322	334	340
Less than 2 years	284	291	302	307
Paralegals & Law Clerks	154	157	164	166

Explanatory Notes

- 1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (USAO) to evaluate requests for attorney's fees in civil cases in District of Columbia courts. The matrix is intended for use in cases in which a feeshifting statute permits the prevailing party to recover "reasonable" attorney's fees. *See*, *e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, or by other Department of Justice components, or in other kinds of cases. The matrix does **not** apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
- 2. A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *See, e.g., Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). Consistent with that definition, the hourly rates in the above matrix were calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers (PPI-OL) index. The survey data comes from ALM Legal Intelligence's 2010 & 2011 Survey of Law Firm Economics. The PPI-OL index is available at http://www.bls.gov/ppi. On that page, under "PPI Databases," and "Industry Data (Producer Price Index PPI)," select either "one screen" or "multi-screen" and in the resulting window use "industry code" 541110 for "Offices of Lawyers" and "product code" 541110541110 for "Offices of Lawyers." The average hourly rates from the 2011 survey data are multiplied by the PPI-OL index for May in the year of the update, divided by 176.6, which is the PPI-OL index for January 2011, the month of the survey data, and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
- 3. The PPI-OL index has been adopted as the inflator for hourly rates because it better reflects the mix of legal services that law firms collectively offer, as opposed to the legal services that typical consumers use, which is what the CPI-

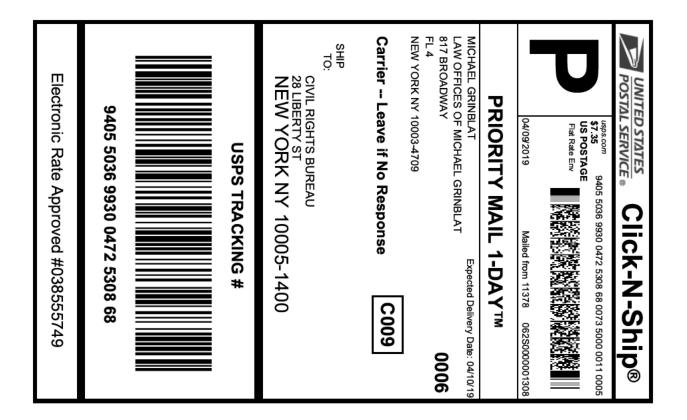
Legal Services index measures. Although it is a national index, and not a local one, *cf. Eley v. District of Columbia*, 793 F.3d 97, 102 (D.C. Cir. 2015) (noting criticism of national inflation index), the PPI-OL index has historically been generous relative to other possibly applicable inflation indexes, and so its use should minimize disputes about whether the inflator is sufficient.

- 4. The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc.* 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore (DC-MD-VA-WV) area. Because the USAO rates for the years 2014-15 and earlier have been generally accepted as reasonable by courts in the District of Columbia, *see* note 9 below, the USAO rates for those years will remain the same as previously published on the USAO's public website. That is, the USAO rates for years prior to and including 2014-15 remain based on the prior methodology, *i.e.*, the original *Laffey* Matrix updated by the CPI-U for the Washington-Baltimore area. *See Citizens for Responsibility & Ethics in Washington v. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015) and Declaration of Dr. Laura A. Malowane filed therein on Sept. 22, 2015 (Civ. Action No. 12-1491, ECF No. 46-1) (confirming that the USAO rates for 2014-15 computed using prior methodology are reasonable).
- 5. Although the USAO will not issue recalculated *Laffey* Matrices for past years using the new methodology, it will not oppose the use of that methodology (if properly applied) to calculate reasonable attorney's fees under applicable feeshifting statutes for periods prior to June 2015, provided that methodology is used consistently to calculate the entire fee amount. Similarly, although the USAO will no longer issue an updated *Laffey* Matrix computed using the prior methodology, it will not oppose the use of the prior methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods after May 2015, provided that methodology is used consistently to calculate the entire fee amount.
- 6. The various "brackets" in the column headed "Experience" refer to the attorney's years of experience practicing law. Normally, an attorney's experience will be calculated starting from the attorney's graduation from law school. Thus, the "Less than 2 years" bracket is generally applicable to attorneys in their first and second years after graduation from law school, and the "2-3 years" bracket generally becomes applicable on the second anniversary of the attorney's graduation (*i.e.*, at the beginning of the third year following law school). See Laffey, 572 F. Supp. at 371. An adjustment may be necessary, however, if the attorney's admission to the bar was significantly delayed or the attorney did not otherwise follow a typical career progression. See, e.g., EPIC v. Dep't of Homeland Sec., 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); EPIC v. Dep't of Homeland Sec., 982 F. Supp. 2d 56, 60-61 (D.D.C. 2013) (same). The various experience levels were selected by relying on the levels in the ALM Legal Intelligence 2011 survey data. Although finer gradations in experience level might yield different estimates of market rates, it is important to have statistically sufficient sample sizes for each experience level. The experience categories in the current USAO Matrix are based on statistically significant sample sizes for each experience level.
- 7. ALM Legal Intelligence's 2011 survey data does not include rates for paralegals and law clerks. Unless and until reliable survey data about actual paralegal/law clerk rates in the D.C. metropolitan area become available, the USAO will compute the hourly rate for Paralegals & Law Clerks using the most recent historical rate from the USAO's former *Laffey* Matrix (*i.e.*, \$150 for 2014-15) updated with the PPI-OL index. The formula is \$150 multiplied by the PPI-OL index for May in the year of the update, divided by 194.3 (the PPI-OL index for May 2014), and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
- 8. The USAO anticipates periodically revising the above matrix if more recent reliable survey data becomes available, especially data specific to the D.C. market, and in the interim years updating the most recent survey data with the PPI-OL index, or a comparable index for the District of Columbia if such a locality-specific index becomes available.
- 9. Use of an updated *Laffey* Matrix was implicitly endorsed by the Court of Appeals in *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc). The Court of Appeals subsequently stated that parties may rely on the updated *Laffey* Matrix prepared by the USAO as evidence of prevailing market rates for litigation counsel in the Washington, D.C. area. *See Covington v. District of Columbia*, 57 F.3d 1101, 1105 & n.14, 1109 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996). Most lower federal courts in the District of Columbia

have relied on the USAO's Laffey Matrix, rather than the so-called "Salazar Matrix" (also known as the "LSI Matrix" or the "Enhanced Laffey Matrix"), as the "benchmark for reasonable fees" in this jurisdiction. Miller v. Holzmann, 575 F. Supp. 2d 2, 18 n.29 (D.D.C. 2008) (quoting *Pleasants v. Ridge*, 424 F. Supp. 2d 67, 71 n.2 (D.D.C. 2006)); see, e.g., Joaquin v. Friendship Pub. Charter Sch., 188 F. Supp. 3d 1 (D.D.C. 2016); Prunty v. Vivendi, 195 F. Supp. 3d 107 (D.D.C. 2016); CREW v. U.S. Dep't of Justice, 142 F. Supp. 3d 1 (D.D.C. 2015); McAllister v. District of Columbia, 21 F. Supp. 3d 94 (D.D.C. 2014); Embassy of Fed. Republic of Nigeria v. Ugwuonye, 297 F.R.D. 4, 15 (D.D.C. 2013); Berke v. Bureau of Prisons, 942 F. Supp. 2d 71, 77 (D.D.C. 2013); Fisher v. Friendship Pub. Charter Sch., 880 F. Supp. 2d 149, 154-55 (D.D.C. 2012); Sykes v. District of Columbia, 870 F. Supp. 2d 86, 93-96 (D.D.C. 2012); Heller v. District of Columbia, 832 F. Supp. 2d 32, 40-49 (D.D.C. 2011); Hayes v. D.C. Public Schools, 815 F. Supp. 2d 134, 142-43 (D.D.C. 2011); Queen Anne's Conservation Ass'n v. Dep't of State, 800 F. Supp. 2d 195, 200-01 (D.D.C. 2011); Woodland v. Viacom, Inc., 255 F.R.D. 278, 279-80 (D.D.C. 2008); American Lands Alliance v. Norton, 525 F. Supp. 2d 135, 148-50 (D.D.C. 2007). But see, e.g., Salazar v. District of Columbia, 123 F. Supp. 2d 8, 13-15 (D.D.C. 2000). Since initial publication of the instant USAO Matrix in 2015, numerous courts similarly have employed the USAO Matrix rather than the Salazar Matrix for fees incurred since 2015. E.g., Electronic Privacy Information Center v. United States Drug Enforcement Agency, 266 F. Supp. 3d 162, 171 (D.D.C. 2017) ("After examining the case law and the supporting evidence offered by both parties, the Court is persuaded that the updated USAO matrix, which covers billing rates from 2015 to 2017, is the most suitable choice here.") (requiring recalculation of fees that applicant had computed according to Salazar Matrix); Clemente v. FBI, No. 08-1252 (BJR) (D.D.C. Mar. 24, 2017), 2017 WL 3669617, at *5 (applying USAO Matrix, as it is "based on much more current data than the Salazar Matrix"); Gatore v. United States Dep't of Homeland Security, 286 F. Supp. 3d 25, 37 (D.D.C. 2017) (although plaintiff had submitted a "great deal of evidence regarding [the] prevailing market rates for complex federal litigation' to demonstrate that its requested [Salazar] rates are entitled to a presumption of reasonableness, . . . the Court nonetheless concludes that the defendant has rebutted that presumption and shown that the current USAO Matrix is the more accurate matrix for estimating the prevailing rates for complex federal litigation in this District"); DL v. District of Columbia, 267 F. Supp. 3d 55, 70 (D.D.C. 2017) ("the USAO Matrix ha[s] more indicia of reliability and more accurately represents prevailing market rates" than the Salazar Matrix). The USAO contends that the Salazar Matrix is fundamentally flawed, does not use the Salazar Matrix to determine whether fee awards under fee-shifting statutes are reasonable, and will not consent to pay hourly rates calculated with the methodology on which that matrix is based. The United States recently submitted an appellate brief that further explains the reliability of the USAO Matrix vis-à-vis the Salazar matrix. See Br. for the United States as Amicus Curiae Supporting Appellees, DL v. District of Columbia, No. 18-7004 (D.C. Cir. filed July 20, 2018).

EXHIBIT 3

RECEIPTS



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USPS TRACKING #: 9405 5036 9930 0472 5308 68

Trans. #: 461207570 Print Date: Ship Date: 04/09/2019 04/09/2019 Delivery Date: 04/10/2019 Priority Mail® Postage: Total

\$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

CIVIL RIGHTS BUREAU To:

28 LIBERTY ST

NEW YORK NY 10005-1400

Retail Pricing Priority Mail rates apply. There is no fee for USPS Tracking® service on Priority Mail service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



Michael Grinblat <michael.grinblatesq@gmail.com>

USPS - Click-N-Ship(R) Payment Confirmation

1 message

USPS Shipping Services@usps.com

<USPS_Shipping_Services@usps.com> To: michael.grinblatesq@gmail.com

Tue, Apr 9, 2019 at 10:44 AM



Sign in | Shipping History | Manage Your Mail | Customer Service

USPS-Click-N-Ship® Payment Confirmation

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Additional information regarding your label(s) can be found in your Shipping History. From your Shipping History you can Ship Again, track your package, or request a refund.

Click-N-Ship® Payment Details

Acct #: 127314311

Transaction Number: 461207570

Transaction Date/Time: 04/09/2019 09:39 AM CDT

Transaction Amount: \$7.35 Payment Method: VISA-0669

Priority Mail® 1-Day Flat Rate Envelope

9405 5036 9930 0472 5308 68 (Sequence Number 1 of 1)

Scheduled Delivery Date: 04/10/2019

Shipped to:

CIVIL RIGHTS BUREAU

28 LIBERTY ST

NEW YORK NY 10005-1400

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USPS® Item Delivered, To Agent 9405503699300472530868

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Thu, Apr 11, 2019 at 10:06 AM



Hello MICHAEL GRINBLAT,

Your item has been delivered to an agent at 10:01 am on April 11, 2019 in NEW YORK, NY 10005.

Tracking Number: 9405503699300472530868

Delivered, To Agent

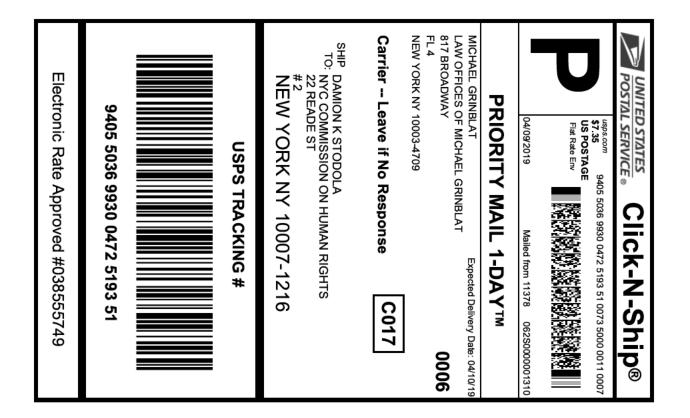


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- 4. To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
- 5. Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING #: 9405 5036 9930 0472 5193 51

Trans. #: 461206864 Print Date: Ship Date: 04/09/2019 04/09/2019 Delivery Date: 04/10/2019 Priority Mail® Postage: Total

\$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

DAMION K STODOLA To:

NYC COMMISSION ON HUMAN RIGHTS

22 READE ST

NEW YORK NY 10007-1216



USPS - Click-N-Ship(R) Payment Confirmation

1 message

USPS Shipping Services@usps.com

<USPS_Shipping_Services@usps.com> To: michael.grinblatesq@gmail.com

Tue, Apr 9, 2019 at 10:34 AM



Sign in | Shipping History | Manage Your Mail | Customer Service

USPS-Click-N-Ship® Payment Confirmation

Thanks for shipping with us, MICHAEL GRINBLAT!

Additional information regarding your label(s) can be found in your Shipping History. From your Shipping History you can Ship Again, track your package, or request a refund.

Click-N-Ship® Payment Details

Acct #: 127314311

Transaction Number: 461206864

Transaction Date/Time: 04/09/2019 09:33 AM CDT

Transaction Amount: \$7.35 Payment Method: VISA-0669

Priority Mail® 1-Day Flat Rate Envelope

9405 5036 9930 0472 5193 51 (Sequence Number 1 of 1)

Scheduled Delivery Date: 04/10/2019 Shipped to: DAMION K STODOLA

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NEW YORK NY 10007-1216

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1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Thu, Apr 11, 2019 at 12:20 PM



Hello MICHAEL GRINBLAT,

Your item was delivered to the front desk, reception area, or mail room at 12:14 pm on April 11, 2019 in NEW YORK, NY 10007.

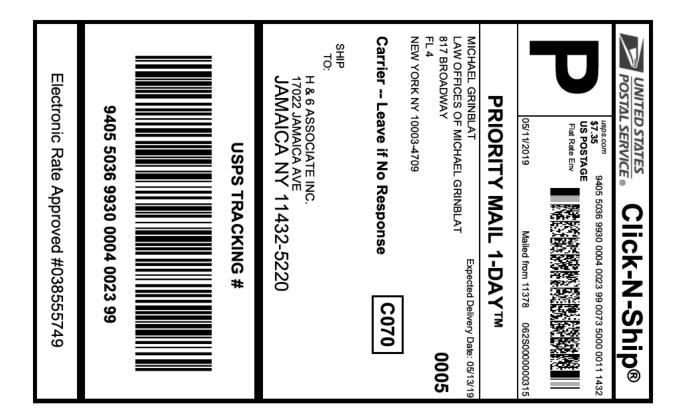
Tracking Number: 9405503699300472519351

Delivered, Front Desk/Reception/Mail Room



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USPS TRACKING #: 9405 5036 9930 0004 0023 99

Trans. #: 463762507 Print Date: Ship Date: 05/11/2019 05/11/2019 Delivery Date: 05/13/2019 Priority Mail® Postage: Total

\$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

H & 6 ASSOCIATE INC. To:

17022 JAMAICA AVE JAMAICA NY 11432-5220



USPS® Item Delivered, In/At Mailbox 9405503699300004002399

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Tue, May 14, 2019 at 11:48 AM



Hello MICHAEL GRINBLAT,

Your item was delivered in or at the mailbox at 11:42 am on May 14, 2019 in JAMAICA, NY 11432.

Tracking Number: <u>9405503699300004002399</u>

Delivered, In/At Mailbox

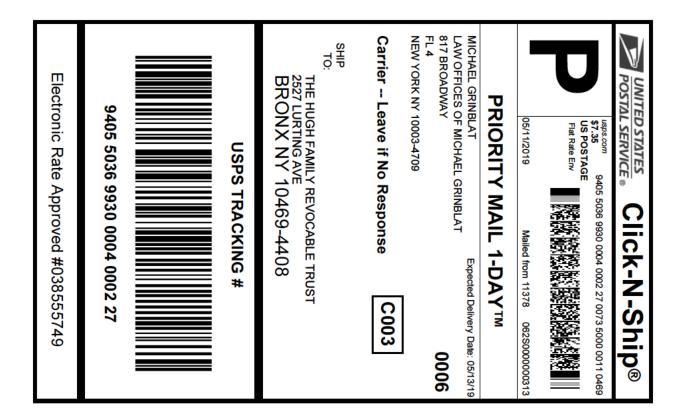


Tracking & Delivery Options

My Account

Visit <u>USPS Tracking</u>® to check the most up-to-date status of your package. Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive emails from USPS, log in to your USPS.com account.





-⊁<-

Cut on dotted line.

Instructions

- Each Click-N-Ship® label is unique. Labels are to be used as printed and used only once. DO NOT PHOTO COPY OR ALTER LABEL.
- Place your label so it does not wrap around the edge of the package.
- Adhere your label to the package. A self-adhesive label is recommended. If tape or glue is used, DO NOT TAPE OVER BARCODE. Be sure all edges are secure.
- To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
- Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING #: 9405 5036 9930 0004 0002 27

Trans. #: 463762029
Print Date: 05/11/2019
Ship Date: Expected
Delivery Date: 05/13/2019

Priority Mail® Postage: Total \$7.35 \$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

To: THE HUGH FAMILY REVOCABLE TRUST

2527 LURTING AVE BRONX NY 10469-4408



USPS® Item Delivered, In/At Mailbox 9405503699300004000227

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Tue, May 14, 2019 at 5:03 PM



Hello MICHAEL GRINBLAT,

Your item was delivered in or at the mailbox at 4:54 pm on May 14, 2019 in BRONX, NY 10469.

Tracking Number: <u>9405503699300004000227</u>

Delivered, In/At Mailbox



Tracking & Delivery Options

My Account

Visit <u>USPS Tracking</u>® to check the most up-to-date status of your package. Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive emails from USPS, log in to your <u>USPS.com</u> account.



Alexander LE & Co. Inc.

SINCE 1962

ALEXANDER POOLE & Co., INC. PO Box 69, ALBANY, NY 12201 TELEPHONE 518-436-0895 • FAX 518-436-7366 EMAIL INFO@ALEXANDERPOOLE.COM

Federal ID # 14-1482374

Invoice #

1919696

May 16, 2019

14453 Law Offices of Michael Grinblat Michael Grinblat 817 Broadway Fourth Fl., New York NY 10003

PAID

Routine	You Contract o	r File No.: RE: Hugh Trust r SFS No.:
Semyon Grinblat, individually and on behalf of all others similari VS H & 6 Associate Inc., The Hugh Family Revocable Trust, et al	ly situated Plaintiff/Petitioner	Date Received: 5/2/2019 Serve By Date: 5/15/2019 Date Returnable:
	Defendant/Respondent	Docket or ID #: 19-cv-2034LDH-SMG Court: U. S. District
Re: The Hugh Family F	Revocable Trust	County: Eastern Dist.

Emailed/Faxed to Cust.: 5/10/2019

Summons in a Civil Action with Exhibits

Date Served/Complete:

Method: Authorized Agent

File:

Docs. Served Svc. Provided

Server:

Ahmed Abderrahman

Address Attempted: 2527 Lurting Ave., Bronx, NY 10469

5/9/2019

Date	Service Description		Service Fee
5/2/19	Process Serving-Out of Town - To "Jane Doe" - Refused name	-	\$95.00
5/2/19	Print Copies @ .15 per page		\$5.00
Payments Mi 05/06/2019	ade: by Credit Card Transaction #PI0227273483 - Applied \$100.00 of \$171.00	Total Service Fees	\$100.00 -\$100.00
		Payments/Credits	-\$100.00

There will be a \$35.00 fee charged for any returned check.

We also accept eChecks, PayPal, Visa, Mastercard, American Express & Discover

14453 Law Offices of Michael Grinblat Michael Grinblat 817 Broadway Fourth Fl., New York NY 10003

Customer Fax:

No Fax on File

Invoice#:

1919696

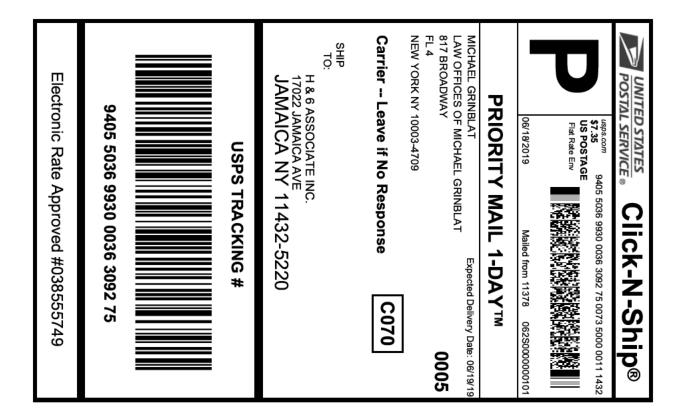
Invoice Date:

5/16/2019

Total Amount Due:

\$0.00

Alexander, Poole & Co., Inc. P.O. Box 69 Albany, New York, 12201



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- 5. Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING #: 9405 5036 9930 0036 3092 75

Trans. #: 466394898 Print Date: Ship Date: 06/18/2019 06/18/2019 Delivery Date: 06/19/2019 Priority Mail® Postage: Total

\$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

H & 6 ASSOCIATE INC. To:

17022 JAMAICA AVE JAMAICA NY 11432-5220



USPS® Item Delivered, Front Door/Porch 9405503699300036309275

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Thu, Jun 20, 2019 at 11:45 AM



Hello MICHAEL GRINBLAT,

Your item was delivered at the front door or porch at 11:38 am on June 20, 2019 in JAMAICA, NY 11432.

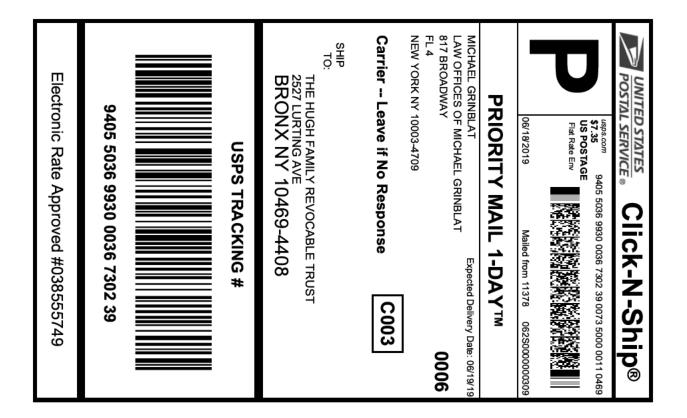
Tracking Number: 9405503699300036309275

Delivered, Front Door/Porch



Tracking & Delivery Options My Account

Visit <u>USPS Tracking</u>® to check the most up-to-date status of your package. Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive emails from USPS, log in to your USPS.com account.



Instructions

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- 5. Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING #: 9405 5036 9930 0036 7302 39

Trans. #: 466429760 Print Date: Ship Date: 06/18/2019 06/18/2019 Delivery Date: 06/19/2019 Priority Mail® Postage: Total

\$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

THE HUGH FAMILY REVOCABLE TRUST To:

> 2527 LURTING AVE BRONX NY 10469-4408



USPS® Item Delivered, In/At Mailbox 9405503699300036730239

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Thu, Jun 20, 2019 at 3:39 PM



Hello MICHAEL GRINBLAT,

Your item was delivered in or at the mailbox at 3:32 pm on June 20, 2019 in BRONX, NY 10469.

Tracking Number: 9405503699300036730239

Delivered, In/At Mailbox

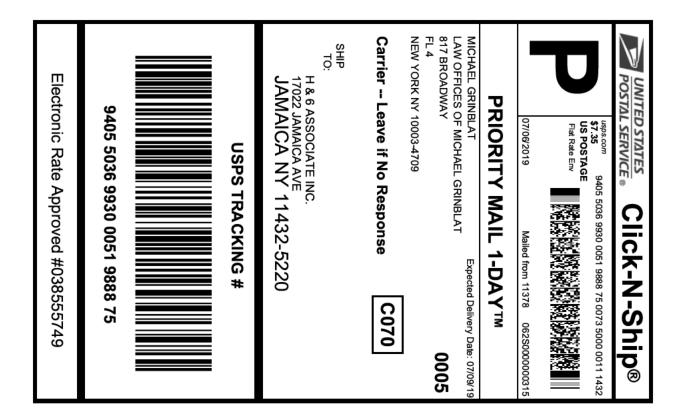


Tracking & Delivery Options

My Account

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Cut on dotted line.

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- Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING #: 9405 5036 9930 0051 9888 75

Trans. #: 467663942
Print Date: 07/06/2019
Ship Date: 07/06/2019
Expected
Delivery Date: 07/09/2019

Priority Mail® Postage: \$7.35 Total \$7.35

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

To: H & 6 ASSOCIATE INC.

17022 JAMAICA AVE JAMAICA NY 11432-5220



USPS® Item Delivered, Front Door/Porch 9405503699300051988875

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Tue, Jul 9, 2019 at 10:58 AM



Hello MICHAEL GRINBLAT,

Your item was delivered at the front door or porch at 10:52 am on July 9, 2019 in JAMAICA, NY 11432.

Tracking Number: 9405503699300051988875

Delivered, Front Door/Porch



Tracking & Delivery Options My Account

Visit <u>USPS Tracking</u>® to check the most up-to-date status of your package. Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive emails from USPS, log in to your USPS.com account.

STAPLES

Customer Receipt

LHC431756 SHIPPED THROUGH

Staples #0841 58-12 Queens Blvd. Queens, NY 11377 (718) 424-5355

Ship Date: 7/9/2019 Expected Delivery Date: 7/10/2019 Carrier & Service: UPS Ground

Ship from

Michael Grinblat

Law Offices of Michael Grinblat

817 Broadway

Fourth Floor

New York, NY 10003, US

Commercial

Telephone: +1 (347) 796-0712 (Mobile) michael.grinblatesg@gmail.com

Ship to

Honorable LaShann DeArcy Hall **United States District Court** 225 Cadman Plaza E Brooklyn, NY 11201, US Commercial

Shipment Summary

Packages in shipment:

Shipment ID: POS Number: Weight(Actual):

6861648981 1.40 lb, Manual Wt

LHC431756

Shipment Charges

Package(s) Charges:

\$10.22

Shipment Total:

\$10.22

Package 1

Tracking Number Packed:

Package type: Dimensions: Weight(Actual): Content Details: 1Z5AR1130336649385 By Customer

Custom Package L 17 in W 13 in H 1 in

1.40 lb, Manual Wt documents binder

Package 1 Charges

\$10.22 UPS Ground: \$10.22 Package 1 SubTotal:

Track Your Shipment

Log on to www.ups.com or contact UPS at 1-800-PICK-UPS.

Damaged, Lost or Late Claims

In the event that your package is damaged, lost or late, please contact the Staples® Ship Center Claims Department at 1-800-797-5924. Hours of operation: Monday-Friday: 9 A.M.- 8 P.M. EST.

All late claims must be called into the Staples Ship Center Claims Department within 15 days of the expected delivery date as per UPS policy. Keep ALL packaging materials and this Invoice, as well as proof of value for damaged or lost packages. Claims take 2 to 6 weeks for review and payment (if approved).

By signing the merchant receipt, I understand/agree that:

- I am subject to all Staples and UPS Terms and Conditions. See www.ups.com for further details. Staples reserves the right to open and inspect any package to be shipped.

- Staples will not be liable for damage to packages improperly packed, unless my receipt shows that I paid for Staples to pack the package.

 Staples will not ship any hazardous materials or other restricted items and you affirm that any package you have packed and offered to Staples for shipment does not contain such contents.
- Parcel Insurance.
 - a. I may elect to pay an additional, optional fee (as specified on this receipt) for Staples' parcel insurance which is offered as part of Staples' UPS Ship Center services. Such fees do not include any markup by, or commission payment to, Staples. This insurance does not provide any insurance to you -- you are neither an insured nor an additional insured under Staples' parcel insurance.

 b. Any claims for disputes related to parcel insurance must be pursued in arbitration not in any court proceeding, and must be pursued on an individual basis only, not in any form of class or representative action. Complete terms and conditions regarding individual binding arbitration are available at www.ups.com.

 - c. Staples' liability on any claim for loss or damage of a package with parcel insurance shall not exceed the lesser of (a) the insured value, (b) repair cost, (c) actual cost, (d) replacement cost, or (e) invoice price (where the shipped property has been sold). In all other cases, Staples' liability shall not exceed UPS's maximum liability for loss or damage under it's Tariff/Terms and Conditions of Service available for review on www.ups.com.

 International packages may be subject to duties, taxes and brokerage fees as determined by the destination country, to be paid by the receiving party.

 These duties and taxes cannot be prepaid or estimated by Staples.

By signing the merchant receipt, you acknowledge that Staples will NOT ship any hazardous materials or other restricted items, and you affirm that any package you have packed and offered to Staples for shipment does not contain such contents.

STAPLES

58-12 QUEENS QUEENS, NY 11377 (718) 424-5355

NYC DCA EL#1229564 NYC DCA EHASD#1241180 SALE 1838976 5 005 32324

0841 07/09/19 11:28

QTY SKU

PRICE

Visa Credit

USD\$10.22

Card No.: XXXXXXXXX

Chip Read

Auth No.: 019072 AID.: A0000000031010

TOTAL ITEMS 1

Staples brand products.
Below Budget. Above Expectations.

THANK YOU FOR SHOPPING AT STAPLES!

Shop online at www.staples.com



Receipt

Print Date: Jul 11, 2019

REFERENCE	
Ship Date:	Jul 10, 2019
Ship from ZIP:	10003
Weight:	0 lbs. 1 oz.
User:	michaelg5000
Cost Code:	<none></none>
Refund Type:	E-refund
Reference #:	
Printed on:	Shipping label
Tracking #:	00040899563029889200
	Ship Date: Ship from ZIP: Weight: User: Cost Code: Refund Type: Reference #: Printed on:

SERVICE		UNIT PRICE
First Class ® Envelope		\$0.50
Tracking		\$0.00
Insurance (N/A)		
Certified Mail Cost		\$3.50
Return Receipt Cost		\$2.80
	Subtotal	\$6.80
	Label Quantity	1
	Total Cost	\$6.80



Receipt

Print Date: Jul 12, 2019

RETURN TO	REFERENCE	
Michael Grinblat, Esq.	Ship Date:	Jul 12, 2019
817 Broadway, Fourth Floor	Ship from ZIP:	10003
New York, NY 10003	Weight:	0 lbs. 10 oz.
	User:	michaelg5000
SHIP TO	Cost Code:	<none></none>
H & 6 Associate Inc.	Refund Type:	E-refund
17022 Jamaica Avenue	Reference #:	
Jamaica, NY 11432 US	Printed on:	Shipping label
	Tracking #:	9414711899561445026381

SERVICE		UNIT PRICE
First Class ® Large Envelope/Flat		\$2.35
Tracking		\$0.00
Insurance (N/A)		
Certified Mail Cost		\$3.50
Return Receipt Cost		\$2.80
	Subtotal	\$8.65
	Label Quantity	1
	Total Cost	\$8.65

USPS Tracking®

FAQs > (https://www.usps.com/faqs/uspstracking-faqs.htm)

Track Another Package +

Tracking Number: 9414711899561445026381

Remove X

Your package is on its way to a USPS facility. Sign up to **get updates**, and we'll send you a delivery date and time when available.

Pre-Shipment

July 12, 2019 at 1:26 pm Shipping Label Created, USPS Awaiting Item MASPETH, NY 11378

reedback

Text & Email Updates



○ Confilmation - We Received Your Request

9414711899561445026381

Your updates will be sent to:

michael.grinblatesq@gmail.com

When new tracking activity is available, you'll get notifications based on your selections.

Tracking History



July 12, 2019, 1:26 pm Shipping Label Created, USPS Awaiting Item MASPETH, NY 11378

A shipping label has been prepared for your item at 1:26 pm on July 12, 2019 in MASPETH, NY 11378. This does not indicate receipt by the USPS or the actual mailing date.

Product Information Postal Product: First-Class Mail® Features: Certified Mail™ Return Receipt

See Less ^

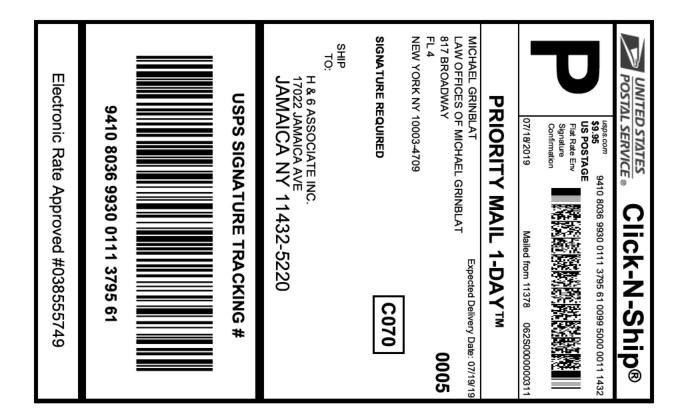
Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (https://www.usps.com/faqs/uspstracking-faqs.htm)

The easiest tracking number is the one you don't have to know.

With Informed Delivery®, you never have to type in another tracking number. Sign up to:



Instructions

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- 5. Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

Signature Confirmation™: 9410 8036 9930 0111 3795 61

468519494 Trans. #: Print Date: Ship Date: 07/18/2019 07/18/2019 Delivery Date: 07/19/2019 Priority Mail® Postage: Signature Confirmation \$2.60 (Electronic Rate) Total

\$9.95

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

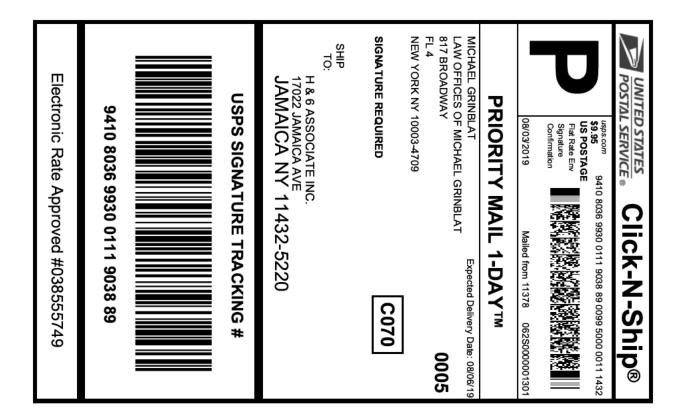
NEW YORK NY 10003-4709

H & 6 ASSOCIATE INC. To:

17022 JAMAICA AVE JAMAICA NY 11432-5220

U.S. Postal Service™ Case 1:19-cv-02034-LDHCSMGTIP@DMentLESREIted | 02/11/20 | Page 59 of 101 PageID #: 367 1285 Domestic Mail Only For delivery information, visit our website at www.usps.com® »M Certified Mail Fee \$3.50 0021 \$2.80 28 Extra Services & Fees (check box, add fe 2019 as appropriate 1000 \$0.00 Return Receipt (electronic) USPSHere Certified Mail Restricted Delivery \$0.00 Adult Signature Required \$
Adult Signature Restricted Delivery \$ \$0.00 1830 Postage \$2.65 S Total Postage and Fees 95 07/22/2019 7018 Associate Inci and Apt. No. of PO Box No. 0-22 Jamaica Avenue

5502	ASPETH 69TH	ST	
(800 07/22/2	397-00: 3)275-: 2019-1:	21 8777 2:49 pm	
	=====	=======	
Product		Unit Price	
First-Class Mail® Large Envelope	1	\$2.65	\$2.65
(Domestic) (JAMAICA, NY 1 (Weight:0 Lb 11 (Estimated Deli (Wednesday 07/2 Certified	.80 02	z) Jate)	
(USPS Certified (70181830000191	-Mat1	#)	\$3.50
Return Receipt (USPS Return Rec (95909402503990	コンピィドピ	OEV	\$2.80
First-Class Mail® Large Envelope (Domestic)	1	\$2.35	\$2.35
(JAMAICA, NY 1: (Weight:O Lb 9.8 (Estimated Deliv (Wednesday 07/22	30 Oz) /erv D	ate))	
Certified (USPS Certified (701818300001913	Mail:	#>	\$3.50
Retarn Receipt (USPS Return Rec (959094025039909	eipt #	#))	\$2.80
First-Class Mail® Large Envelope (Domestic)	1	\$2.50	\$2.50
(JAMAICA, NY 11 (Weight:O Lb 10. (Estimated Deliv (Wednesday 07/24	30 0z) erv Da	ate)	
Certified (USPS Certified (701818300001913	Mail # 61247)	‡)	\$3.50
(USPS Return Rec (959094025039909	eipt #	1)	\$2.80
WildScenic Rivers Frogs Bklt Sesame Street	1	\$6.60 \$11.00 \$8.80	\$13.20 \$11.00 \$8.80
Total:			\$59.40
Credit Card Remitd (Card Name:VISA) (Account #:XXXXXX)	ххххх		\$ 59.40
(Approval #:11226 (Transaction #:51 (AID:A000000000310 (AL:Visa Credit) (PIN:Not Required	7)	Cr	nip)



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Click-N-Ship® Label Record

Signature Confirmation™: 9410 8036 9930 0111 9038 89

Trans. #: 469609873 Print Date: Ship Date: 08/03/2019 08/03/2019 Delivery Date: 08/06/2019 Priority Mail® Postage: Signature Confirmation \$2.60 (Electronic Rate) Total \$9.95

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

H & 6 ASSOCIATE INC. To:

17022 JAMAICA AVE JAMAICA NY 11432-5220



USPS® Item Delivered 9410803699300111903889

1 message

auto-reply@usps.com <auto-reply@usps.com> To: michael.grinblatesq@gmail.com

Tue, Aug 6, 2019 at 11:11 AM



Hello MICHAEL GRINBLAT,

Your item was delivered at 11:09 am on August 6, 2019 in JAMAICA, NY 11432. The item was signed for by R H.

Tracking Number: <u>9410803699300111903889</u>

Delivered



Tracking & Delivery Options

My Account

Visit <u>USPS Tracking</u>® to check the most up-to-date status of your package. Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive emails from USPS, log in to your USPS.com account.



August 6, 2019

Dear Michael Grinblat:

The following is in response to your request for proof of delivery on your item with the tracking number: **9410 8036 9930 0111 9038 89**.

Item Details

Status: Delivered

Status Date / Time: August 6, 2019, 11:09 am Location: JAMAICA, NY 11432

Priority Mail®

Extra Services: Signature Confirmation™

Up to \$50 insurance included

Recipient Name: TONAME
Actual Recipient Name: R H

Note: Actual Recipient Name may vary if the intended recipient is not available at the time of delivery.

Shipment Details

Weight: 1lb, 1.0oz

Destination Delivery Address

Street Address: 17022 JAMAICA AVE
City, State ZIP Code: JAMAICA, NY 11432-5220

Recipient Signature

Signature of Recipient:

17022 JAMAICA AVE JAMAICA, NY 11432

Address of Recipient:

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service® 475 L'Enfant Plaza SW Washington, D.C. 20260-0004



USPS® Item Delivered, Left with Individual 70181830000191291537

1 message

auto-reply@usps.com <auto-reply@usps.com> To michael grinblatesq@gmail com

Wed, Aug 7, 2019 at 11:54 AM



Hello Michael Grinblat,

Your item was delivered to an individual at the address at 11 52 am on August 7, 2019 in JAMAICA, NY 11432.

Tracking Number: 70181830000191291537

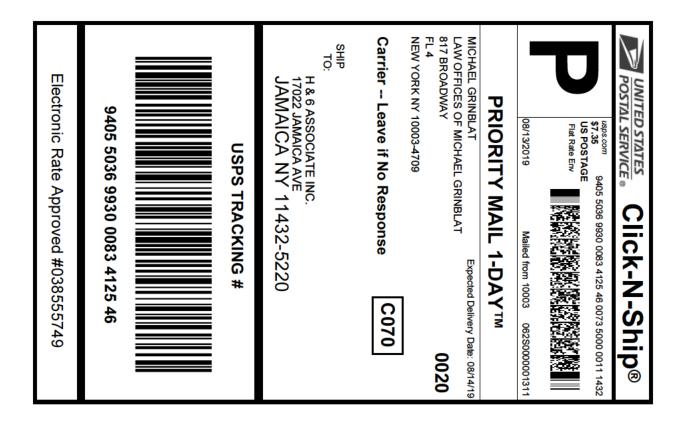
Delivered, Left with Individual



Tracking & Delivery Options

My Account

Vi it <u>USPS Tracking</u>® to check the mo t up to date tatu of your package Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive email from USPS, log in to your USPS com account



-≫-

Cut on dotted line.

Instructions

- Each Click-N-Ship® label is unique. Labels are to be used as printed and used only once. DO NOT PHOTO COPY OR ALTER LABEL.
- Place your label so it does not wrap around the edge of the package.
- Adhere your label to the package. A self-adhesive label is recommended. If tape or glue is used, DO NOT TAPE OVER BARCODE. Be sure all edges are secure.
- To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
- Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

USPS TRACKING #: 9405 5036 9930 0083 4125 46

Trans. #: 470237741
Print Date: 08/13/2019
Ship Date: 08/13/2019
Expected 0elivery Date: 08/14/2019

Priority Mail® Postage: Total

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

To: H & 6 ASSOCIATE INC.

17022 JAMAICA AVE JAMAICA NY 11432-5220



USPS® Item Delivered, In/At Mailbox 9405503699300083412546

1 message

auto-reply@usps.com <auto-reply@usps.com> To michael grinblatesq@gmail com

Wed, Aug 14, 2019 at 10:54 AM



Hello MICHAEL GRINBLAT,

Your item was delivered in or at the mailbo at 10 53 am on August 14, 2019 in JAMAICA, NY 11432.

Tracking Number: 9405503699300083412546

Delivered, In/At Mailbox



Tracking & Delivery Options

My Account

Vi it <u>USPS Tracking</u>® to check the mo t up to date tatu of your package Sign up for <u>Informed Delivery</u>® to digitally preview the address side of your incoming letter-sized mail and manage your packages scheduled to arrive soon! To update how frequently you receive email from USPS, log in to your USPS com account



First-Class Package International Service® is temporarily unavailable on Click-N-Ship®. Please select a different Service Type or visit a Post Office™ location to complete your shipment.

Create Label Preferences Address Book **Shipping History** Account # **Label Details** Label Number: 9405503699300083412546 Acceptance Cutoff: 08/13/2019 5:00 PM Acceptance Time: 08/13/2019 8:30 PM Expected Date: 08/14/2019 11:59 PM **Delivery Status:** Delivered, In/At 2019-08-14 **Label Actions** 10:53:00.0 **USPS Tracking®** Ship Again Need help File an insurance claim Request A Service Refund Return Address: Package: MICHAEL GRINBLAT Ship Date: 08/13/19 LAW OFFICES OF MICHAEL GRINBLAT Value: \$20.00 817 BROADWAY From: 10003 FL 4 NEW YORK, NY 10003-4709 Service: michael.grinblatesq@gmail.com Priority Mail® 1-Day Flat Rate Envelope **Delivery Address:** USPS Tracking® H & 6 ASSOCIATE INC. 17022 JAMAICA AVE JAMAICA, NY 11432-5220 Transaction Number: 470237741 \$7 35 Postage Cost USPS Tracking® Free Transaction Type: Label Label Total: \$7.35 VISA-0669 Payment Method: Order Total: \$7.35 Payment Status: Account Charged **Timestamp** Message 08-13-2019 09:19:55 LABEL PRINTED 08-13-2019 09:18:58 Getting Payment 08-13-2019 09:18:40 Setting Payment **Back to Shipping History**



Instructions

- 1. Each Click-N-Ship® label is unique. Labels are to be used as printed and used only once. DO NOT PHOTO COPY OR ALTER LABEL.
- 2. Place your label so it does not wrap around the edge of the package.
- 3. Adhere your label to the package. A self-adhesive label is recommended. If tape or glue is used, DO NOT TAPE OVER BARCODE. Be sure all edges are secure.
- 4. To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
- 5. Mail your package on the "Ship Date" you selected when creating this label.

Click-N-Ship® Label Record

Signature Confirmation™: 9410 8036 9930 0117 9679 08

Trans. #: 483070426 Print Date: 01/30/2020 01/30/2020 Ship Date: 01/31/2020 Delivery Date:

Priority Mail® Postage: Signature Confirmation: \$2.65 (Electronic Rate) Total:

\$10.40

From: MICHAEL GRINBLAT

LAW OFFICES OF MICHAEL GRINBLAT

817 BROADWAY

FL 4

NEW YORK NY 10003-4709

H & 6 ASSOCIATE INC. 17022 JAMAICA AVE

JAMAICA NY 11432-5220

Did you know you can request a refund online for unused Click-N-Ship® labels in your Shipping History? Click here to learn more.

Create Label Preferences Shipping History Address Book SCAN Form

Account #

Label Details

Label Number:

9410803699300117967908

Terms

Acceptance Cutoff: 01/30/2020 5:00 PM
Acceptance Time: 01/30/2020 6:55 PM
Expected Date: 01/31/2020 11:59 PM
Delivery Status: Delivered

2020-01-31 10:54:00.0

Label Actions

USPS Tracking® Ship Again

Need help

File an insurance claim Request A Service Refund

Return Address:

MICHAEL GRINBLAT LAW OFFICES OF MICHAEL GRINBLAT 817 BROADWAY FL 4 NEW YORK, NY 10003-4709 michael.grinblatesq@gmail.com

Delivery Address:

H & 6 ASSOCIATE INC. 17022 JAMAICA AVE JAMAICA, NY 11432-5220

Package:

Ship Date: 01/30/20 Value: \$50.00 From: 10003

Service:

Priority Mail® 1-Day Flat Rate Envelope Signature Confirmation

Transaction Number: 4

Transaction Type:

483070426

Label

Payment Method: VISA-0669

Payment Status: Account Charged

Signature Confirmation

Postage Cost

Label Total: \$10.40

Order Total: \$10.40

1	1
Timestamp	Message
01-30-2020 09:39:19	LABEL PRINTED
01-30-2020 09:39:03	Getting Payment
01-30-2020 09:38:49	Setting Payment

Tracking for this label is available until January 30, 2021. Need to keep Tracking history longer? Find out if your label is eligible for Premium Tracking today!

Back to Shipping History

\$7.75

\$2.65

January 31, 2020

Dear Michael Grinblat:

The following is in response to your request for proof of delivery on your item with the tracking number: 9410 8036 9930 0117 9679 08.

Item Details

Status: Delivered

Status Date / Time: January 31, 2020, 10:54 am

Location: JAMAICA, NY 11432

Priority Mail®

Extra Services: Signature Confirmation™

Up to \$50 insurance included

Recipient Name: TONAME
Actual Recipient Name: D D

Note: Actual Recipient Name may vary if the intended recipient is not available at the time of delivery.

Shipment Details

Weight: 1lb, 1.0oz

Destination Delivery Address

Street Address: 17022 JAMAICA AVE
City, State ZIP Code: JAMAICA, NY 11432-5220

Recipient Signature

Signature of Recipient:

17022 JAMAICA AVE JAMAICA, NY 11432

Address of Recipient:

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely, United States Postal Service® 475 L'Enfant Plaza SW Washington, D.C. 20260-0004 Alexander POOLE & Co. Inc.

SINCE 1962

PO Box 69, Albany, NY 12201
TELEPHONE 518-436-0895 • Fax 518-436-7366
EMAIL INFO@ALEXANDERPOOLE.COM

14453 Law Offices of Michael Grinblat Michael Grinblat 817 Broadway Fourth Fl., New York NY 10003 Our Job#

1920209

Your File No.: Grinblat

Date Returnable:

Docket or ID #: 19-cv-2034LDH-SMG

Court: U. S. District
County: Eastern Dist.

Date Served: 5/8/2019

Semyon Grinblat, individually and on behalf of all others similarly situated

Plaintiff/Petitioner

H & 6 Associate Inc. et al

Defendant/Respondent

Served On:

H & 6 Associate Inc.

Docs. Served Summons in a Civil Action with Exhibits

Pursuant to Business Corporation Law §306

Served via New York Secretary of State:

This is your receipt for service via the New York State Secretary of State.

The affidavit for this service was mailed to you previously on 5/8/2019.

Do not dispose of this receipt from the NY Secretary of State. It is an integral part of your service and should be kept with the affidavit of service which was previously mailed.

State of New York - Department of State Receipt for Service

Service Company: 02 ALEXANDER POOLE & CO., INC. - 02

Service was directed to be made pursuant to: SECTION 306 OF THE BUSINESS

CORPORATION LAW

Party Served: H & 6 ASSOCIATE INC.

Plaintiff/Petitioner:

GRINBLAT, SEMYON

Service of Process Address: H & 6 ASSOCIATE INC. 170-22 JAMAICA AVE JAMAICA, NY 11432

> Secretary of State By NANCY DOUGHERTY

EXHIBIT 4

CORRESPONDENCE

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

April 9, 2019

Damion K. L. Stodola General Counsel NYC Commission on Human Rights 22 Reade Street, 2nd Floor New York, NY 10007

By Priority Mail. USPS Tracking Number: 9405 5036 9930 0472 5193 51

Re: SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034

Dear Mr. Stodola:

The purpose of this correspondence is to notify your office, pursuant to NYC Human Rights Law §8-502(c), that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from discrimination of my client by the defendants, on the basis of disability, in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107. Enclosed please find a copy of the complaint.

Please contact me should you have any questions, or concerns.

Very truly yours,

Michael Grinblat
Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

April 9, 2019

Civil Rights Bureau 28 Liberty Street New York, NY 10005

By Priority Mail. USPS Tracking Number: 9405 5036 9930 0472 5308 68

Attn.: To Whom It May Concern

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & <u>6 ASSOCIATE INC.</u>, THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X,

entities yet unknown
Case No.: 19-cv-2034

Dear Sir or Madam:

The purpose of this correspondence is to notify your office, pursuant to NYS Civil Rights Law §40-d, that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants, on the basis of disability, in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107. Enclosed please find a copy of the complaint.

Please contact me should you have any questions, or concerns.

Very truly yours,

Michael Grinblat
Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

July 9, 2019

Honorable LaShann DeArcy Hall United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

COURTESY COPY OF THE MOTION FOR DEFAULT JUDGMENT – ORIGINAL FILED BY ECF AND ASSIGNED DOCKET NUMBER 19-cv-2034-LDH-SMG

Dear Judge Hall:

Enclosed please find a courtesy copy of the Motion for Default Judgment against H & 6 Associate Inc., filed in the above-entitled action on July 6, 2019.

Very truly yours,

Michael Grinblat, Esq.

lichael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

May 11, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

Attention: Owner

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

By Priority Mail. USPS Tracking #: 9405 5036 9930 0004 0023 99

Dear Sir or Madam:

Please be advised that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107. Enclosed please find courtesy copies of the summons and complaint, which are being served on the Secretary of State.

Please contact me should you have any questions, concerns, or to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Vichael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

May 11, 2019

The Hugh Family Revocable Trust 2527 Lurting Avenue Bronx, NY 10469

Attention: Trustee(s) and/or Owner(s)

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & <u>6 ASSOCIATE INC.</u>, THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

By Priority Mail. USPS Tracking #: 9405 5036 9930 0004 0002 27

Dear Sir or Madam:

Please be advised that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107. Enclosed please find courtesy copies of the summons and complaint, which were served by personal service.

Please contact me should you have any questions, concerns, or to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Vichael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

June 18, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY PRIORITY MAIL. USPS Tracking #: 9405 5036 9930 0036 3092 75

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & <u>6 ASSOCIATE INC.</u>, THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107.

Summons and complaint were duly served upon your corporation through the New York State Secretary of State on May 8, 2019. Under Federal Rules of Civil Procedure, Rule 12(a), you were required to plead, or otherwise respond, to the complaint, by May 29, 2019. Because the service was performed, in part, by mail, you were entitled to three additional days to answer, or respond. Your time to respond was further extended, because the date, on which you were required to plead, or respond, fell on a weekend. Consequently, you were required to answer, or otherwise respond, by June 3, 2019. You failed to do that. You also did not contact me. Because of that, today I filed an application for a certificate of default with the Clerk for the United States District Court for the Eastern District of New York. Enclosed please find a courtesy copy of the application with exhibits, which include summons, complaint and affidavit of service. I expect the clerk to certify default in the next few days. Once default is certified, I will move for a default judgment.

Case 1:19-cv-02034-LDH-SMG Document 19 Filed 02/11/20 Page 81 of 101 PageID #: 389

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

June 18, 2019

Page 2

Please be further advised that my goal is to avoid costly litigation and to resolve this matter amicably. My ultimate goal is the defendants' compliance with the 2010 ADA Standards and accessibility for the disabled.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

June 18, 2019

The Hugh Family Revocable Trust 2527 Lurting Avenue Bronx, NY 10469

Attention: Trustee(s) and/or Owner(s)

BY PRIORITY MAIL. USPS Tracking #: 9405 5036 9930 0036 7302 39

Re: SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Dear Sir or Madam:

Please be advised that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107.

Summons and complaint were duly served upon your trust through the New York State Secretary of State on May 9, 2019. Under Federal Rules of Civil Procedure, Rule 12(a), you were required to plead, or otherwise respond, to the complaint, by May 30, 2019. Because the service was performed, in part, by mail, you were entitled to three additional days to answer, or respond. Your time to respond was further extended, because the date, on which you were required to plead, or respond, fell on a weekend. Consequently, you were required to answer, or otherwise respond, by June 3, 2019. You failed to do that. You also did not contact me. Because of that, today I filed an application for a certificate of default with the Clerk for the United States District Court for the Eastern District of New York. Enclosed please find a courtesy copy of the application with exhibits, which include summons, complaint and affidavit of service. I expect the clerk to certify default in the next few days. Once default is certified, I will move for a default judgment.

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

June 18, 2019

Page 2

Please be further advised that my goal is to avoid costly litigation and to resolve this matter amicably. My ultimate goal is the defendants' compliance with the 2010 ADA Standards and accessibility for the disabled.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

July 6, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY PRIORITY MAIL. USPS Tracking #: 9405 5036 9930 0051 9888 75

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & <u>6 ASSOCIATE INC.</u>, THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107.

Summons and complaint were duly served upon your corporation through the New York State Secretary of State on May 8, 2019. Under Federal Rules of Civil Procedure, Rule 12(a), you were required to plead, or otherwise respond, to the complaint, by May 29, 2019. Because the service was performed, in part, by mail, you were entitled to three additional days to answer, or respond. Your time to respond was further extended, because the date, on which you were required to plead, or respond, fell on a weekend. Consequently, you were required to answer, or otherwise respond, by June 3, 2019. You failed to do that. You also did not contact me. Because of that, I filed an application for a certificate of default with the Clerk for the United States District Court for the Eastern District of New York. The Clerk of the Court issued the certificate of default and I subsequently filed a motion for default judgment on July 6, 2019. Enclosed please find a copy of the motion for default judgment, including the exhibits.

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown Case No.: 19-cv-2034-LDH-SMG

July 6, 2019 Page 2

Please be further advised that my goal is to avoid costly litigation and to resolve this matter amicably. My ultimate goal is the defendants' compliance with the 2010 ADA Standards and accessibility for the disabled.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

July 10, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY FIRST CLASS MAIL

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & <u>6 ASSOCIATE INC.</u>, THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Enclosed please find a copy of the Affidavit of Service, with exhibits, regarding service on you of the Motion for Default Judgment, which was electronically filed with the Court on July 6, 2019.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

July 10, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY CERTIFIED MAIL. RETURN RECEIPT REQUESTED.

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Enclosed please find a copy of the Order issued by Magistrate Judge Steven M. Gold on July 9, 2019.

Very truly yours,

Michael Grinblat, Esq.

ichael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

July 12, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY FIRST CLASS MAIL, CERTIFIED MAIL, RETURN RECEIPT REQUESTED USPS Tracking #: 9414711899561445026381

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that my law firm filed the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on April 9, 2019. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act, 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107.

Summons and complaint were duly served upon your corporation through the New York State Secretary of State on May 8, 2019. Under Federal Rules of Civil Procedure, Rule 12(a), you were required to plead, or otherwise respond, to the complaint, by May 29, 2019. Because the service was performed, in part, by mail, you were entitled to three additional days to answer, or respond. Your time to respond was further extended, because the date, on which you were required to plead, or respond, fell on a weekend. Consequently, you were required to answer, or otherwise respond, by June 3, 2019. You failed to do that. You also did not contact me. Because of that, I filed an application for a certificate of default with the Clerk of the United States District Court for the Eastern District of New York. The Clerk of the Court issued the certificate of default and I subsequently filed a motion for default judgment on July 6, 2019. Enclosed please find a copy of the motion for default judgment, including the exhibits.

Case 1:19-cv-02034-LDH-SMG Document 19 Filed 02/11/20 Page 89 of 101 PageID #: 397

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

July 12, 2019

Page 2

Please note that this is the second correspondence, with which I am sending you a copy of the motion for default judgment, with exhibits, against your corporation. The first correspondence, with which I also included a copy of the same motion, with exhibits, was sent to you on the day the motion was filed, July 6, 2019. It was sent by priority mail service of US Mail, but I did not request a return receipt. Consequently, I am sending you this correspondence, by certified mail, return receipt requested.

Please be further advised that my goal is to avoid costly litigation and to resolve this matter amicably. My ultimate goal is the defendants' compliance with the 2010 ADA Standards and accessibility for the disabled.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat
Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

July 18, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY PRIORITY MAIL, RETURN RECEIPT REQUESTED USPS Tracking #: 9414711899561445026381

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that I filed a motion for default judgment against your corporation on July 6, 2019. On July 9, 2019, Magistrate Judge Steven M. Gold issued an order, which directs you to make submissions no later than July 26, 2019. That order also directs me to notify you of it promptly, by certified mail, return receipt requested. I sent you a copy of the motion, with all exhibits, on the same day I filed it, July 6, 2019, by priority mail, but did not request return receipt. Subsequently, on July 12, 2019, I sent you a copy of the order by certified mail, return receipt requested. However, I did not receive a return receipt and it is possible that the correspondence has been lost by the post office. Consequently, with this correspondence, I am sending you a copy of the motion for default judgment, with all exhibits, and a copy of Magistrate Judge Gold's order. I am also enclosing copies of the letters I sent you on the two previous aforementioned dates.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Michael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

August 3, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY PRIORITY MAIL, SIGNATURE CONFIRMATION USPS Signature Tracking #: 9410 8036 9930 0111 9038 89

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

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Please be advised that I filed a motion for default judgment against your corporation on July 6, 2019. On July 9, 2019, Magistrate Judge Steven M. Gold issued an order, which directs you to make submissions no later than July 26, 2019. That order also directs me to notify you of it promptly, by certified mail, return receipt requested. I sent you a copy of the motion, with all exhibits, on the same day I filed it, July 6, 2019, by priority mail, but did not request return receipt. Subsequently, on July 12, 2019, I sent you a copy of the order by certified mail, return receipt requested. However, I did not receive a return receipt and it is possible that the correspondence has been lost by the post office. Consequently, with this correspondence, I am sending you a copy of the motion for default judgment, with all exhibits, and a copy of Magistrate Judge Gold's order by priority mail, signature confirmation requested. I am also enclosing copies of the letters I sent you on the two previous aforementioned dates. This is the third time I am serving you with the Motion for Default Judgment.

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

August 3, 2019

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Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

August 5, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & <u>6 ASSOCIATE INC.</u>, THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that I filed a motion for default judgment against your corporation on July 6, 2019. On July 9, 2019, Magistrate Judge Steven M. Gold issued an order, which directs you to make submissions no later than July 26, 2019. That order also directs me to notify you of it promptly, by certified mail, return receipt requested. I sent you a copy of the motion, with all exhibits, on the same day I filed it, July 6, 2019, by priority mail, but did not request return receipt. Subsequently, on July 12, 2019, I sent you a copy of the order by certified mail, return receipt requested. However, I did not receive a return receipt and it is possible that the correspondence has been lost by the post office. Consequently, on August 3, 2019, I sent you a copy of the motion for default judgment, with all exhibits, and a copy of Magistrate Judge Gold's order by priority mail, signature confirmation requested. With that correspondence I also enclosed copies of the letters I sent you on the previous aforementioned dates. In addition, with this correspondence I am sending you the same documents I sent you on August 3, 2019, by certified mail, return receipt requested. This is the fourth time I am serving you with the Motion for Default Judgment with exhibits, together with the other aforementioned documents.

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

August 5, 2019

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Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat
Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

August 13, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY PRIORITY MAIL, TRACKING NUMBER: 9405 5036 9930 0083 4125 46

Re: SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Enclosed please find the Affidavit of Service regarding the Motion for Default Judgment against H & 6 ASSOCIATE INC. and the Court's Order of July 9, 2019.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Michael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

September 3, 2019

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY FIRST CLASS MAIL

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Enclosed please find the Notice of Voluntary Dismissal of The Hugh Family Revocable Trust, which I filed with the Court today.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Michael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

September 3, 2019

The Hugh Family Revocable Trust 2527 Lurting Avenue Bronx, NY 10469

Attention: Trustee(s) and/or Owner(s)

BY FIRST CLASS MAIL

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., THE HUGH FAMILY REVOCABLE TRUST, JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Dear Sir or Madam:

Enclosed please find the Notice of Voluntary Dismissal of The Hugh Family Revocable Trust, which I filed with the Court today.

Very truly yours,

Michael Grinblat, Esq.

lichael Grinblat

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

February 8, 2020

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY FIRST CLASS MAIL

Re: SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H &

6 ASSOCIATE INC., JOHN DOE 1-X, persons yet unknown, Limited Liability

Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that my law firm filed the Motion to Reopen Case in the above-entitled legal action on behalf of my client, Semyon Grinblat, in the federal court for the Eastern District of New York on February 8, 2020. A copy of the Motion is enclosed.

Please be further advised that my goal is to avoid costly litigation and to resolve this matter amicably. My ultimate goal is the defendants' compliance with the 2010 ADA Standards and accessibility for the disabled.

Please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

January 30, 2020

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY PRIORITY MAIL. SIGNATURE CONFIRMATION REQUESTED. TRACKING NUMBER: 9410 8036 9930 0117 9679 08

Re: <u>SEMYON GRINBLAT</u>, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Please be advised that I filed the motion for default judgment against your corporation on July 6, 2019. On January 28, 2020, Magistrate Judge Steven M. Gold issued the Report and Recommendation on that motion and directed me to serve a copy of that document on the defendant at its last known address. I am hereby complying with the Court's order. In addition, for your convenience and reference, enclosed please also find copies of the complaint, summons, affidavit of service, request for a certificate of default, motion for default judgment and Report and Recommendation, which includes both the Court's notice I received by electronic mail and the 12-page Report and Recommendation.

As I wrote to you on several occasions in the past, my ultimate goal is the defendant's compliance with the Americans with Disabilities Act. Please contact me at your earliest convenience to discuss settlement of this matter. If the case is not going to be settled, the Court will issue an order of default judgment, which will include an injunction. This has very serious consequences.

SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H & 6 ASSOCIATE INC., JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

January 30, 2020

Page 2

Once again, please contact me at your earliest convenience to discuss settlement of this matter.

Very truly yours,

Michael Grinblat Michael Grinblat, Esq.

Telephone: (347) 796-0712 Facsimile: (212) 202-5130 michael.grinblatesq@gmail.com

January 31, 2020

H & 6 Associate Inc. 170-22 Jamaica Avenue Jamaica, NY 11432

BY FIRST CLASS MAIL

Re: SEMYON GRINBLAT, individually and on behalf of all others similarly situated v. H &

6 ASSOCIATE INC., JOHN DOE 1-X, persons yet unknown, Limited Liability

Companies, Partnerships, Corporations 1-X, entities yet unknown

Case No.: 19-cv-2034-LDH-SMG

Attention: Chief Executive Officer of H & 6 Associate Inc.

Dear Sir or Madam:

Enclosed please find the affidavit of service regarding Magistrate Judge Steven M. Gold's report and recommendation.

Very truly yours,

Michael Grinblat, Esq.

Michael Grinblat